



# **FORCES COMMAND CONTRACTING MANAGEMENT REVIEWS**

**“A GUIDE FOR SUCCESS”  
FORSCOM Pamphlet 715-9**

**FORCES COMMAND  
CONTRACTING DIVISION - DCSLOG  
FORT MCPHERSON, GA 30330-1062**

**1 September 2001 (Seventh Edition)  
DRAFT**

**Procurement  
CONTRACTING MANAGEMENT REVIEW (CMR) GUIDE**

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**History.** This pamphlet was last printed in February 1992. This edition updates the 31 January 1999 electronic version and also supersedes the February 1992 printed edition.

**Summary.** This pamphlet provides guidance for efficient and effective conduct of Contracting Management Reviews (CMRs) within Forces Command (FORSCOM).

**Applicability.** This pamphlet is for use by HQ FORSCOM for review of FORSCOM contracting offices and FORSCOM Installation Directorate of Contracting (DOC) personnel to prepare for FORSCOM CMRs.

**Changes.** Changes to this publication are not official unless they are authenticated by the DCSC4, FORSCOM, 1777 Hardee Avenue, SW., Fort McPherson, GA 30330-1062. Users will destroy changes on their expiration dates unless sooner superseded or rescinded.

**Suggested improvements.** The proponent agency of this pamphlet is the Deputy Chief of Staff for Logistics (DCSLOG), FORSCOM, 1777 Hardee Avenue, SW., Fort McPherson, GA 30330-1062. Users are invited to send comments/suggested improvements on DA Form 2028 (Recommended changes to Publications and Blank Forms) to DCS for Logistics, FORSCOM, 1777 Hardee Avenue, SW., Fort McPherson, GA 30330-1062.

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**\* This pamphlet supersedes FORSCOM Pamphlet 715-9, dated 31 January 1999.**

## **FOREWORD**

The purpose of this guide is to standardize Command procedures for efficient conduct of CMRs. It provides a “ready reference” for CMR teams to use while conducting reviews and measuring performance. It is also an excellent tool for DOCs to use for internal reviews; however, users are cautioned that this pamphlet should not be used as a source in lieu of appropriate regulations. These procedures establish standards and provide uniformity and consistency in reviews and reports, to assure that all FORSCOM contracting organizations are measured in the same manner.

The objectives of the CMR are to ensure that contracting is accomplished in compliance with established laws, regulations, policies, procedures and directives; to assess the organization's condition, capability to perform assigned mission and customer support; and to assist managers in the development of suitable approaches to resolve problems.

# **TABLE OF CONTENTS**

**CHAPTER 1** **5**  
***OVERVIEW OF THE CONTRACT***  
***MANAGEMENT REVIEW (CMR)***  
***PROCESS***

<b>1-1. Introduction</b>	<b>5</b>
<b>1-2. CMR Approach</b>	<b>5</b>
<b>1-3. Responsibilities</b>	<b>8</b>
<b>1-4. Notification to the Contracting Organization</b>	<b>11</b>
<b>1-5. In-Briefs</b>	<b>12</b>
<b>1-6. In-Process Reviews</b>	<b>12</b>
<b>1-7. Out-Briefs</b>	<b>12</b>
<b>1-8. Lessons Learned</b>	<b>13</b>

**CHAPTER 2** **13**  
***STANDARDS AND REPORT FORMAT***

<b>2-1. General</b>	<b>13</b>
<b>2-2. Standards</b>	<b>13</b>
<b>2-3. Report Format</b>	<b>14</b>
<b>2-4. Completion of the Contracting Management Review</b>	<b>16</b>
<b>2-5. Follow-Up Review</b>	<b>17</b>

**EXHIBIT A** **18**  
***SUMMARY OF PROCESSES AND***  
***CONTROLS***

**EXHIBIT B** **83**  
***SUMMARY OF PROCESSES AND***  
***CONTROLS - NAF***

***APPENDIX A***  
***Sample Notification Letter***

***APPENDIX B-1***  
***Instructions for Completion of Rating Form***

***APPENDIX B-2***  
***FORSCOM Contracting Management Review***

***APPENDIX C-1***  
***Contracting Management Review (CMR)***  
***In-Brief for Garrison Commander***

***APPENDIX C-2***  
***Contracting Management Review***  
***In-Brief for Directorate of Contracting (DOC)***

***APPENDIX D-1***  
***Contracting Management Review (CMR)***  
***Out-Brief for Directorate of Contracting (DOC)***

***APPENDIX D-2***  
***Contracting Management Review (CMR)***  
***Out-Brief for Garrison Commander***

***APPENDIX E***  
***CMR Milestones***

***APPENDIX F***  
***Centurion and the DOC***

***APPENDIX G***  
***Legal Support***

***APPENDIX H***  
***Areas of Special Interest for FY 00 and 01***

## **Chapter 1**

### **Overview of the Contract Management Review (CMR) Process**

#### **1-1. Introduction**

a. The CMR process is designed to assess the ability of a DOC to manage itself, operate effectively as a part of a management team and efficiently execute contractual actions. During a CMR, the PARC team endeavors to:

(1) Assess the business processes and management controls used by the DOC and determine whether these methods provide reasonable assurance that the mission is accomplished in a quality, timely manner and in compliance with established laws, regulations, policies, procedures, and directives.

(2) Assess the DOC's focus on DA Areas of Special Interest and application of innovative contracting methods.

(3) Provide assistance in solving problems, creating efficiencies and implementing new procedures. DOCs are encouraged to pose assistance topics during pre-CMR communications.

b. Comprehensive pre-CMR planning is indispensable to the success of the process. If planning is properly executed, the review team will be familiar with the organization to be reviewed and knowledgeable of mission, workload and staffing issues. Awareness of known strengths and weaknesses is also helpful to focus efforts. This reduces the need for extensive on-site briefings, interviews, and study of internal and external directives or instructions. The adequacy of pre-CMR planning and preparation will be noted during the review process. Planning should include use of other reports, e.g., Inspector General, Internal Review, Army Audit Agency and General Accounting Office.

c. The overall objective of the CMR is to maximize contract mission performance.

#### **1-2. CMR Approach**

The approach in conducting the CMR process is moving from a traditional auditing methodology to a more contemporary process review. Using this philosophy, the DOC is responsible to develop a self-assessment of the DOC operation. Though the PARC CMR occurs only every 2-3 years, it is incumbent upon the DOC to implement a self-assessment that occurs at least once a year. The results can then be rolled up into the report required prior to a scheduled CMR. The CMR review by the PARC team is conducted to validate the self-assessment.

a. Self-Assessment. Each organization is responsible to develop and implement processes – encompassing organizational structure, policies and procedures - that successfully accomplish business objectives. These processes must be monitored by “checks and balances” referred to as management controls, which reasonably ensure that: objectives and mission are achieved; resources are used consistently with mission; laws, regulations and policies are followed; reliable and timely information is gathered, maintained, reported and used for decision making; and

quality standards are met. At the DOC level, some processes are mandated by higher authority and some are established locally. Likewise, some management controls are established and monitored by higher headquarters, such as the CMR process, while others must be developed and enacted at the DOC level. The DOC must be confident that the locally established management controls ensure that all categories of processes are accomplished effectively and efficiently, and that any deficiencies are identified and corrected. If this is successfully realized, the DOC will be prepared to satisfy the controls established at higher levels. The purpose of the self-assessment is to review the processes and management controls as well as samplings of final products to determine if mission and goals are being met in an effective manner. In addition to the comments and contributions from members within the organization, input must be sought from external customers. This is an opportunity to build upon strengths, correct weaknesses and identify areas that need change, such as processes that do not add value. The four components of the self-assessment process are as follows:

(1) *Determine and Execute Methodology.* The DOC must first plan the method and procedures that will be used to conduct the self-assessment.

(a) All members of the organization should have the opportunity to provide input. However, conflict of interest issues must be considered. Generally, managers and employees should not assess areas that they supervise or work within. Also, DOCs must also consider the time, human resources and skills required to implement the methodology.

(b) Logically, some traditional “auditing” is necessary by reviewing sample products for regulatory compliance issues, as well as use of acquisition reform initiatives. The review should then progress to an assessment of the processes used to conduct business, as well as the management controls in place to ensure that the processes are carried out successfully. A thorough assessment will also include input from external customers.

(2) *Document the Self-Assessment.*

(a) Documentation is necessary to form the written record of the self-assessment. Though the level of detail is at the discretion of the DOC, the report should be sufficient to assure the CMR team that a well-planned and thorough assessment has been made. The document should explain the methodology and strategy used, as well as the results captured. Some degree of audit trail back to the contract files is necessary to demonstrate that the quality of the final product has been examined.

(b) Findings and observations, as defined in 2.2.a., must be documented. Certainly, it is difficult for an organization to voluntarily acknowledge shortcomings. DOCs are encouraged to approach this in a positive, constructive manner with emphasis on the intent to improve the overall operation. As a starting point, DOCs shall address the findings and observations from the previous CMR and describe the steps taken to alleviate these issues.

(c) Explain the processes and controls used within the DOC. Determine and discuss which are working well and which are not. Following are types of controls adopted from the General Accounting Office for use by DOCs:

(i) Documentation: Written descriptions of process goals and operational procedures.

(ii) Records: Files maintained to provide an audit trail.

(iii) Authorization: Procedures in place to establish authority levels and prevent personnel from exceeding their authority.

(iv) Structure: The overall framework for work performance which delineates the separation of key duties among individuals within the work setting.

(v) Supervision: The assignment, review and approval of work within the control environment to reduce losses and improve achievement of results.

(vi) Security: Systems within the control environment which assign accountability, limit access and safeguard resources.

NOTE: Exhibit A sets forth a “Summary of Processes and Controls” as a guide for conducting the self-assessment. The purpose of the charts is to recognize organizational objectives and the process control that is used to ensure that objectives are successfully accomplished.

(d) If conducted with due diligence, the self-assessment process will enable the DOC to discover areas that are ripe for renovation. These discoveries need not necessarily be labeled as findings or observations, but rather as opportunities for making positive changes within the organization.

(e) Use the self-assessment to showcase the strengths of the DOC. Describe the successes, innovations and efforts to implement DA Areas of Special Interest.

(f) Identify those issues or problems for which CMR team assistance is requested.

(3) *Develop Recommendations.* For each finding, observation and opportunity for change, develop a course of action to resolve the issue. As appropriate, involve working level employees in the brainstorming of solutions and develop the management control that will be used to ensure that success is achieved. Isolated findings or observations will logically require less attention.

(4) *Establish Plans to Implement Recommendations.* For each recommendation, the DOC must establish a plan of execution. The level of detail may vary, but should be comprehensive enough to lead to a procedure and internal control that together resolve the issue. Where significant changes are needed, include a milestone.

b. Validation of Self-Assessment. – The purpose of the CMR is to validate the self-assessment - to gain a reasonable assurance that the business processes and management controls utilized lead to the efficient accomplishment of the mission, and that deficiencies are caught and corrected. Though some review of files may be necessary, the CMR team does not intend to

conduct an exhaustive auditing style review by examining numerous contract files for regulatory compliance. Rather, the team will conduct an overview of the entire DOC operation. If the processes and controls are operating effectively, the CMR team can reasonably presume that compliance issues are met. During the validation process, the CMR team will:

(1) Determine, with a reasonable level of certainty, if the methodology used by the DOC to conduct the self-assessment was appropriate and comprehensive enough to produce a true picture of the overall operation. Also, the team must ensure that the methodology was executed properly. Each CMR team member is responsible for certain areas of the self-assessment and will discuss the methodology used with the DOC point of contact for those areas.

(2) Assess the processes and controls in place. Also, the overall environment of the DOC will be examined, including organizational structure, separation of duties, policies and procedures, reporting, and protection of resources and data. To ensure the successful completion of processes through the use of controls, the climate must fully support those controls. For example, structure is one form of control. If interviews conducted during a CMR indicate that personnel are unaware of the assignment of key duties within the organization, it may be inferred that any processes relying upon this control are at risk.

(3) Verify that the documentation resulting from the self-assessment is thorough and clear. The audit trail will be explored and some random review of files may be made to fully assess quality and compliance issues. The CMR team will review the processes and management controls described in the self-assessment and attempt to verify that these procedures are used as intended and working successfully. Findings and observations will be examined and discussed, with particular emphasis on those that are trends rather than isolated occurrences. The team will take note of the DOC's effort to identify policies and procedures that need improvement, as well as "good ideas" that the DOC may conceive during the self-assessment process. The team will also assess the DOC's efforts to implement DA Areas of Special Interest and take the opportunity to commend successes and innovations.

(4) Review the recommendations to ensure that they are reasonable, within the capabilities of the DOC and consistent with the level of risk posed by the current deficiency.

(5) Examine the plans to implement recommendations. Determine if plans are reasonable, thorough and include milestones where necessary. Where immediate risk mitigation is necessary, the team will ensure that resolution is in progress.

(6) Ensure that the DOC has implemented recommendations from previous self-assessments and that the resultant changes are working effectively.

### **1-3. Responsibilities**

The CMR report officially transmits the review findings, corrective actions and final assessment through command channels to the installation. The responsibilities associated with producing the report are:



a. PARC. The FORSCOM Principal Assistant Responsible for Contracting (PARC) is responsible for the conduct of all FORSCOM CMRs. The PARC:

(1) Approves the report and forwards it through command channels, as appropriate.

(a) When the overall rating is “marginal” or below, the Chief of Staff may be asked to sign a memorandum to the Garrison Commander advising of the DOC's rating and the need for a six-month follow-up.

(b) The PARC will sign all other transmittal letters and reports.

(2) Briefs the Commanding General, Chief of Staff and DCSLOG as necessary.

(3) Delegates the primary responsibility for the CMR Program to the Chief, Management Branch.

b. Management Team. The Chief, Management Branch, will:

(1) Oversee the efficient, effective operation of all CMRs.

(2) In coordination with the PARC, and Chief of PARC Operations, will appoint the CMR Team Leader.

(3) Coordinate with the DOCs to see what assistance is needed before review.

(4) Determine the size and composition of the teams.

(5) In coordination with the appointed CMR Team Leaders, assign specific duties to team members.

(6) Acquire necessary subject matter experts from outside the PARC office if needed.

(7) Appoint a member of the Management Branch as the Logistical Support Coordinator to:

(a) Prepare DOC notification letter.

(b) Coordinate preparation of TDY orders.

(c) Make airline/lodging reservations.

(d) Prepare CMR packets for team members; include a copy of the previous CMR report, rating sheet, any applicable audit reports, logistical information, and any other pertinent DOC information.

(8) Coordinate preparation and staffing of the final CMR report to the PARC for approval not later than (NLT) 30 calendar days following a review. A detailed milestone chart for preparation of the CMR report is at Appendix E.

(9) Track receipt of DOC response, coordinate reclama as needed and file final report.

(10) No later than 30 June, provide the PARC a complete listing of proposed CMRs for the upcoming fiscal year for review and approval. The list will be reviewed quarterly.

(11) Review this guide annually for additions, deletions and general changes as appropriate. Prepare and distribute supplements as needed.

(12) Disseminate lessons learned.

c. The CMR Team Leader is responsible to:

(1) Coordinate required on-site assistance with the DOC, to include arrangements for working space and clerical assistance for the team.

(2) Meet with the PARC at least one week prior to the review for any special issues/concerns.

(3) Ensure that the DOC Self-Assessment is received 30 days prior to CMR. Analyze Self-Assessment and coordinate revisions with the DOC as required.

(4) Meet with team members and discuss work assignments. Appoint a team member to prepare the CMR report.

(5) During CMR, conduct in-process reviews with the Director of Contracting and team members.

(6) Conduct in and out-briefings with Directorate of Contracting personnel and Garrison Commander.

(7) Receive input from all team members. Review input for adequacy and appropriateness, and require rewrites where necessary. Provide data to the individual responsible for compiling the CMR report. Proofread and edit the report and ensure that proper format is used.

(8) Provide edited report to Management Team Chief IAW milestones. Coordinate revisions as required after management review.

(9) Transmit the final CMR report to the installation. Provide a copy to Management Team Chief.

(10) Coordinate with Management Team Chief to review DOC response and prepare PARC reclama.

(11) Make a written assessment to the PARC and Management Team Leader regarding the need for additional guidance, policy or regulatory changes by the PARC office. *(NOTE: This assessment is not part of the CMR report).*

d. CMR Team members are responsible to:

(1) Fully review the DOC self-assessment prior to conducting CMR.

(2) Perform the review in accordance with this pamphlet and the instructions from the Team Leader. Execute duties as assigned by the Team Leader.

(3) Maintain objectivity and verify information. Ensure that review comments are in keeping with the procedures and intent of the CMR process.

(4) Provide required input (reports and lessons learned) to the CMR Team Chief through their Team Leader on all areas reviewed NLT 12 calendar days after completion of the review.

(5) Review DOC's response and assist in preparation of PARC reclama.

e. Directorate of Contracting (DOC). The DOC should submit the self-assessment within the required time frame and ensure that information and arrangements requested in the notification letter are available for the review team upon arrival. The DOC is responsible to ensure that the self-assessment depicts a true picture of the organization's ability to provide timely, quality and cost-effective business solutions for customers.

#### **1-4. Notification to the Contracting Organization**

a. The CMR schedule will be published on the Contracting Division homepage prior to 15 July of each fiscal year. The PARC will notify the DOC at least 90 calendar days prior to the date the review is to begin. A sample notification letter is at Appendix A.

b. The letter will provide the nature, date, and expected duration of the review. The letter will also request a DOC point of contact and may list particular documents that must be made available to the team during the review. Information needed may include:

- (1) Organization Charts
- (2) Mission Statement
- (3) Advance Acquisition Plan
- (4) Source of Work (Customers)
- (5) Policies & Procedures (i.e., local regulation or SOP)
- (6) Manpower (Required, Authorized, On-board)
- (7) Training Status, Including Certification Statistics and Progress Toward Completion of "80 Hours" of Training per Stated Period

c. The notification letter to the DOC will also request that an orientation briefing be presented to the review team on arrival. Subjects should include organization, mission and functions, nature and scope of contracting operations, staffing, acquisition/contracting problems, and results of the self-assessment.

d. The letter will advise the DOC if the FORSCOM NAF Analyst will accompany the team to perform a CMR of Non-appropriated Fund (NAF) Contracting. Non-appropriated Fund procurement performed by the Directorate of Personnel and Community Activities is covered in FORSCOM Pamphlet 215-4.

### **1-5. In-Briefs**

- a. The DOC will provide the results of the self-assessment to the PARC team during the in-brief. Requirements for the brief will be provided to the DOC in the notification letter, but will generally correlate with the components of the self-assessment as set forth in paragraph 1.2.a.
- b. The CMR Team Leader will brief the DOC on the CMR methodology to be used by the team. The Leader will also provide the DOC input on their self-assessment. The format at Appendix C-2 will be used for the DOC briefing.
- c. If requested, the Team Leader and the Director will brief the Garrison Commander on the purpose of the CMR and give him a blank rating form (Appendix B-2). The format at Appendix C-1 will be used for the briefing.

### **1-6. In-Process Reviews**

During the review, the Team Leader will keep the DOC informed of progress and findings. Such meetings assure understanding between the team and the DOC and enable the DOC to take timely action concerning deficiencies identified during the review. Matters of fact are determined at this time (i.e., a document is either in the file or not). The DOC should not be surprised at the out-brief with problems and criticisms that should have been revealed and discussed during the review.

- a. At the close of business each review day, the Team Leader will assemble team members and assess the results of the review for that period. Team members should relay information relative to their specific areas of responsibility and of use to the other members of the team.
- b. Prior to completion of the review and the out-briefing, the Team Leader should conduct a final meeting with the team to review the significant findings and recommendations to be included in the report. During this meeting, the team will conclude whether or not the review has validated the self-assessment prepared by the DOC. If the self-assessment is not validated, the team may assign a different rating or may select an alternate course of action, such as a plan to conduct a six-month follow-up review.

### **1-7. Out-Briefs**

Two separate out-briefs will be conducted, first with the Director and selected staff and second with the Director and the Garrison Commander. The Director has the option of extending the first out-brief to all DOC personnel.

- a. The CMR Team Leader, with the support of the entire CMR team, will brief the DOC and selected staff on the overall concurrence/non-concurrence with the DOC's self-assessment and will discuss specific findings and observations that will be included in the final CMR report. The format at Appendix D-1 will be used.

- b. The out-brief with the Garrison Commander will be conducted by the Team Leader. Selected team members may accompany at the discretion of the Team Leader.
- c. The out-brief should be carefully planned. The format for the out-brief is at Appendix D-2. The Commander is given a completed rating sheet (Appendix B-2).
- d. The Team Leader should thank the Commander, his staff, and all others who contributed to the review. The leader should specify timelines for preparation of the final report and DOC response to the report. Corrective action taken or planned for noted findings is expected in the command's response. Comments on observations and recommendations are optional.
- e. It should be stressed in the out-briefs that all evaluations are tentative and subject to change.

## **1-8. Lessons Learned**

- a. Information obtained from CMRs that should be shared with other contracting offices will be disseminated semi-annually using various means of communication, such as the FORSCOM home page, e-mail, newsletters, memoranda, conferences, and other channels.
- b. Team members will submit a brief summary of lessons learned along with the functional review results to the Team Leader. A designated CMR action officer is responsible for compiling and disseminating lessons learned (See format at Appendix B.3).

## **Chapter 2 Standards and Report Format**

### **2-1. General**

This guide establishes standards for the review and provides the basis for maintaining uniformity and consistency in reviews and reports.

### **2-2. Standards**

The CMR review will provide the DOC, PARC and Garrison Commander a status of the contracting organization as assessed by the team. The report will yield the CMR team's concurrence or non-concurrence with the DOC self-assessment based on specific areas inspected and overall assessment of findings.

- a. During the CMR process, the team will document findings and observations, as defined below. The number and degree of these annotations will logically contribute to the overall rating.

(1) **Finding** – A violation of applicable law or regulation; or a deficiency so severe as to impede the successful completion of the mission. Findings are material and impact the risk

position of the organization as a whole. A finding could be related to a specific incident or could document a general trend within an organization.

(2) Observation – Negative observations document a condition, process or practice that does not violate, or is not covered by, a law or regulation, but creates a situation that is inefficient, inappropriate or nonsensical. Negative observations have the potential to deteriorate into a high-risk practice if not rectified. Positive observations will be used to document successes and innovative practices within the DOC.

b. Five ratings will be used to identify results:

(1) Outstanding - Excellent condition. Effective, efficient, management attention beyond normal standards have been applied. No finding that violates law.

(2) Above Average - Conditions are good and exceed acceptable satisfactory standards. One or two findings, which are administrative in nature.

(3) Satisfactory - Conditions meet acceptable standards, IAW regulations, command guidance and policy. The DOC is functioning at an acceptable level with some deficiencies.

(4) Marginal - Conditions reflect findings in management that impact on efficient operations. Findings are serious but in the opinion of the reviewer may be corrected with minimal oversight and are not severe enough to warrant an unsatisfactory rating. Marginal performance will be reviewed in six months.

(5) Unsatisfactory - Conditions do not meet normal standards and reflect unacceptable management. Findings noted are severe including non-compliance with regulations and command guidance, violations of public law, disregard for command policy, blatant mismanagement of operations and/or repeated, recurring findings. Unsatisfactory performance will be reviewed in six months.

c. The overall rating will consider the PARC validation of the DOCs self-assessment and the DOCs performance as measured against DASA(P) special areas of interest. The Team Leader will present final results to the Garrison Commander. The entire CMR team will brief results to the DOC and selected staff. Rating, strengths and weaknesses will be discussed.

d. If a FORSCOM Staff Judge Advocate (SJA) representative accompanies the CMR team, DOC legal support will be reviewed, but will not be included in the DOC rating. The FORSCOM legal representative will present the review results to the Installation SJA and the Garrison Commander.

## **2-3. Report Format**

a. The report must be clear, concise, easy to read, and as brief as possible. The following format will be used:

(1) Table of Contents - Identifies location of the major subheadings and page numbers. Use the same general format for each report.

(2) Executive Summary - The Executive Summary should be comprehensive enough for the reader to get an overall picture of managerial and operational efficiencies and inefficiencies. It shall be concise, cite the purpose and authority of the review, and cover the mission and workload of the organization. The summary will identify the organization reviewed, when, by whom, and key customers contacted. It should indicate in and out briefings conducted and acknowledge the presence of representatives of the command. As a lead-in to the Summary of Findings, include a brief introductory statement to set the stage for the report and provide the overall rating of the Directorate. Appreciation should be expressed to the Garrison Commander and DOC staff for courtesies and assistance rendered as appropriate. Address validation of the self-assessment. If there are areas of disagreement, identify them, and provide the CMR team's position.

(3) Summary of Findings - Briefly describes all CMR team member findings. Corrective actions are addressed in subsequent sections.

(4) Areas of Special Interest to the Deputy Assistant Secretary of the Army (Procurement) - Includes review results on DA special interest areas (Appendix I).

(5) Management and Administration - An overall evaluation of the Office of the Director and the Support Function introduces this section. An in-depth evaluation of the organizational structure/manpower management, career program management, office management/policy and procedures, and contracting management programs follows.

(6) Acquisition - This section provides an evaluation of the contracting mission and includes FACNET/Electronic Commerce, Micro-purchases, Simplified Acquisition Procedures, Formal Contracts, Contract Administration, and Commercial Items Acquisition.

(7) Nonappropriated Funds - This section includes an evaluation of NAF acquisitions, accomplished by DOC personnel, that exceed the local NAF contracting officer warrant limitation of \$100,000 or the NAF contracting officer's expertise for acquisitions that are below his warrant level.

b. The report is addressed by functional area and each category is reviewed as outlined in Chapter 3. Each section of the report will be organized as follows

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#### SAMPLE

AFLG-PR  
Contract Management Review: Fort (installation) DOC  
DD/MM/YY

#### V. ACQUISITION

1. FACNET/Electronic Commerce. Reviewer(s):

2. Simplified Acquisitions. Reviewer(s):

- a. Evaluation. (Brief summary of Functional Area Review).
- b. Micro-purchases:

Finding: Cardholders are splitting requirements to remain within the micro-purchase threshold and control the acquisition (identify two or more instances).

Corrective Action: Take appropriate action (e.g., suspend cards) to ensure cardholders comply with FAR 13.602(c). Invite legal counsel to address this area in local training classes. Include article in newsletter.

Observation: DOC exceeds the FORSCOM goal of micro-purchases made with the purchase card.

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Sequence all categories as they are shown in Chapter 3. Address all categories. Cite regulatory references for findings noted. Findings should be noted for systemic problems and statutory violations. Single deficiencies do not indicate systemic problems. Team members should advise the DOC of single deficiencies and write findings on two or more occurrences of a deficiency.

d. Brevity is essential. Provide the finding and identify the corrective action. Discussions will be conducted on the spot with the team member, Division Chief, and the Director of Contracting as necessary.

e. Focus on mission-related work. Avoid comments on file neatness and organization unless they have positive or negative impacts on compliance.

#### **2-4. Completion of the Contracting Management Review**

a. The final CMR report will be approved and released to the DOC within 30 days of the completion of the CMR. The DOC then has 60 days to provide a response to the PARC. A DOC response is required if findings were documented in the report. In the absence of findings, a response is optional. If a response is received, the Management Team Chief and CMR Team Leader will review the information and the Team Leader will be responsible to prepare the reclama. All CMR team members will review the DOC's response and provide comments and input as requested by the Team Leader.

b. Each response to a finding will be reviewed by the team member who noted the finding. The team member will research any DOC non-concurrence with findings or challenges to policy



and procedures. A written reclama addressing identified issues will be prepared by the team member and given to the CMR Team Leader within 10 calendar days.

c. The CMR Team Leader will prepare a final memorandum to the DOC within 20 calendar days after receipt of the DOC's response. If the DOC response is determined adequate, the memorandum will simply acknowledge receipt of the acceptable response and no further action is required. If any concerns remain unresolved, the memorandum will identify these issues and provide the appropriate Command guidance. The CMR Team Leader will coordinate the response through the Management Team Chief, who will review and forward the document to the PARC for signature.

d. The HQ FORSCOM response to the DOC on identified issues is the final Command position. This action officially closes the review process.

e. Where appropriate, the PARC will issue policy through Contracting Information Letters (CILs).

## **2-5. Follow-up Review**

A six-month follow-up review is required in the event of a marginal or unsatisfactory rating. The purpose of the follow-up is to ensure that the DOC took appropriate actions to correct findings, and is effectively instituting measures to improve contracting operations. Team members will validate that all recommended corrective actions were implemented. The CMR Team Leader will prepare the follow-up report in the form of an Executive Summary, identifying corrective actions taken, unresolved shortcomings and describing the DOC's present status.

## Summary of Processes and Controls

DOCs may use the following exhibit as a guide when conducting a self-assessment and provide the completed charts as an attachment to the self-assessment. The charts are divided into categories and associated topics. The first column sets forth intended objectives, in the form of checklist type questions. As a starting point, the objectives provided closely mirror those items found in Chapter 3 of the previous CMR Pamphlet. DOCs may tailor the objectives as needed to reflect the mission of the organization. In the next column, the DOC must explain the internal process controls that are used to ensure successful completion of the objectives under that topic. The purpose of this exhibit is not to specifically answer each question, but rather describe the method of oversight for ensuring that the tasks are accomplished. The last two columns display the type of control and control rating, as categorized below.

### **TYPES OF CONTROLS:**

**Documentation (D):** Written descriptions of process goals and operational procedures.

**Records (R):** Files maintained to provide an audit trail.

**Authorization (A):** Procedures in place to establish authority levels and prevent personnel from exceeding their authority.

**Structure (ST):** The overall framework for work performance which delineates the separation of key duties among individuals within the work setting.

**Supervision (SU):** The assignment, review and approval of work within the control environment to reduce losses and improve achievement of results.

**Security (SC):** Systems within the control environment that assign accountability, limit access and safeguard resources.

### **CONTROL RATING – Subjectively evaluates the effectiveness of the control:**

**Strong (S)**

**Adequate (A)**

**Weak (W)**

## Summary of Processes and Controls

### Category/Topic: Management/ Organizational Structure and Manpower Man-Agreement

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Is the organizational structure of the DOC appropriate and effective and does it support the customer?</p> <p>b. Are the lower graded GS-1102 personnel primarily handling purchases under Simplified Acquisition Procedures and journeyman-level 1102's working the more complex procurements?</p> <p>c. Are staffing levels and grade distribution patterns appropriate? Is there evidence of over staffing, over segmentation of the function (for support of grades), or under grading of personnel according to responsibilities assigned? Consider the following factors:</p> <p style="padding-left: 40px;">(1) What is the number of professional contracting personnel at each level of management?</p> <p style="padding-left: 40px;">(2) How many military and civilian personnel?</p> <p style="padding-left: 40px;">(3) How many staff or clerical personnel? Are there sufficient administrative/support personnel to fulfill the needs of the entire organization (e.g., Cost/Price Analyst, Systems Administrator, Property Administrator, and Procurement Analyst)?</p> <p style="padding-left: 40px;">(4) What are the grades or ranks?</p> <p style="padding-left: 40px;">(5) Are personnel requirements handled expeditiously by the DOC?</p> <p style="padding-left: 40px;">(6) What is the ratio of warranted contracting officers to total DOC size? What is Director's rationale for requesting warrants?</p> <p>d. Analyze the causes for separation for the past two or three fiscal years. Excessive turnover may be an indication of poor manpower management.</p> <p>e. For installations that have migrated to the Business Center organizational structure, is DOC in compliance with the</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

Summary of Processes and Controls

<p>FORSCOM Chief of Staff guidance issued 18 Sep 97?</p> <p>(1) Does the DOC report no lower than the Deputy Garrison Commander?</p> <p>(2) Does the senior contracting supervisor retain functional/supervisory control over all contracting personnel?</p> <p>(3) Are collocated cells limited to \$100K in contracting authority (the SAP threshold)?</p>			
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## Summary of Processes and Controls

### Category/Topic: Management/ Career Program Management

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Professionalizing the Workforce. (DOD Directives 5000.23/5000.52-M)</p> <p>(1) Are personnel trained in accordance with DOD Directives 5000.23 (Systems Acquisition Management Careers), 5000.52-M (DOD-Wide Career Program for Acquisition Personnel), and ADS-93-01-GD (Acquisition Career Management, Mandatory Course Fulfillment Program and Competency Standards)?</p> <p>(2) How many employees meet the requirements of the Defense Acquisition Workforce Improvement Act (DAWIA)? Does the Director have an active program to prepare others to meet the requirements?</p> <p>(3) Have all employees been certified for their current position? What plan is in place to ensure that those not certified will be eligible for certification within 18 months of entry date to the position? Are copies of certification certificates kept in a central file? For those not certified, is there a memo present describing what is required for certification, steps being taken to comply, and a target date for certification? Are Level I and Level II acquisition employees who are certified at their current level encouraged to seek certification at the next level?</p> <p>(4) Do new hires meet the education requirements of DAWIA? How many employees have a Bachelor's degree, a Master's degree? What steps are being taken to enable the entire contracting workforce to obtain their Bachelor's Degree and Master's Degree?</p> <p>(5) Are careerists, especially contracting officers, given opportunity and consideration for long term training programs such as LOGAMP, Army Management Staff College (AMSC), Command and General Staff Officer course, or DOD Executive Leadership Development course?</p> <p>(6) Are careerists active in professional organizations such as NCMA or AUSA? Are they encouraged to become certified as CPCM/CACM?</p>			

## Summary of Processes and Controls

<p>(7) Are certification records maintained IAW CIL 97-44?</p> <p>(8) Is the Contracting and Acquisition Training System (CATS) being updated at least quarterly?</p> <p>b. Training Policies and Programs.</p> <p>(1) Is there a local, formal policy on training?</p> <p>(2) What types of training are used, i.e. On-the-job (formal or informal), Correspondence, Departmental or DOD courses, FORSCOM training, e.g., IGE, POMs/PNMs, Contract Administration?</p> <p>(3) Are local educational institutions utilized?</p> <p>(4) To what extent is training used? What is the extent of participation?</p> <p>(5) Formal Classroom Training.</p> <p>(a) Does the Director ensure formal training documentation is reviewed semi-annually for all military and civilian personnel?</p> <p>(b) Do personnel have ready access to DOD Education and Training - DAU Mandatory Courses Catalog and Army Civilian Training, Education and Development System (ACTEDS)?</p> <p>(c) Are mandatory formal training requirements included in automated Individual Development Plans (IDP)? DOD 5000.52M and AFLG-PR memo, 4 August 1999, subject: Applying for Defense Acquisition University (DAU) Courses.</p> <p>(d) Are DD Forms 1556, Request, Authorization, Agreement, Certification of Training and Reimbursement prepared and submitted in a timely manner? (DODM 5010.16-C, 1-7)</p> <p>(e) Are DAU cancellation procedures accomplished through the ATRRS Internet Training Application System (AITAS) so that slots will not be lost due to no-shows.</p> <p>(f) Are travel orders and vouchers submitted timely to the Research Development Acquisition Information Systems Activity (RDAISA)?</p> <p>(g) Has the Director budgeted for formal training of personnel (for other than DAU courses)?</p> <p>(6) In-House Training.</p> <p>(a) Does the office maintain a master file on in-house training? Is there an established training plan?</p> <p>(b) Are training topics pertinent to the contracting mission?</p>			
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## Summary of Processes and Controls

<p>Are results of self-inspections, contract reviews, etc., being selected as topics for in-house training? Are regulatory changes (FAR, DFARS, AFARS, ARs, etc.) discussed?</p> <p>(c) Does in-house training include NAF contracting policies and procedures?</p> <p>(7) Training of specialty personnel (such as contracting officer, property administrator, C/P analyst, COR, QAS, and SA) should be analyzed:</p> <p>(a) Is formal and informal training being provided?</p> <p>(b) Have training plans been developed?</p> <p>(c) Does the training level of these employees allow them to perform their functions in a satisfactory manner?</p> <p>(8) Career Development.</p> <p>(a) Is there a local plan established for civilian career progression? Is it well defined? What is it based on?</p> <p>(b) Is the plan providing for the development of civilian personnel to prepare them for advancement?</p> <p>(c) Has TAPES been implemented? Are performance appraisals processed timely by the organization?</p> <p>(d) Do supervisors assist high-potential employees in finding a suitable mentor and help establish guidelines under which the relationship will operate? (ACTEDS Section VI)</p> <p>(e) Are careerists offered developmental opportunities?</p> <p>(9) Continuing Education.</p> <p>(a) Is DOC aware of the requirement for forty hours of continuing education and training for those employees who are certified and have completed all mandatory training for their current position? (CIL 97-26)</p> <p>(b) Does the Director have a method of tracking and documenting that training which qualifies as Continuing Education?</p> <p>c. Intern Program.</p> <p>(1) Are the DOCs monitoring the intern program IAW Army Civilian Training, Education and Development System (ACTEDS) Plan and the plan set forth in CIL 98-28?</p> <p>(2) Are interns briefed on conditions governing the program such as training, mobility, and travel requirements?</p> <p>(3) Has the Director informed FORSCOM of the following:</p>			
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## Summary of Processes and Controls

<p>Name of intern; Beginning training grades (GS level); Program start date; Estimated program completion date.</p> <p>(4) Does the Director or the Deputy counsel the intern at least quarterly?</p> <p>(5) Is a performance appraisal completed and discussed at least semi-annually?</p> <p>(6) Does the intern have a mentor or other specific person who is responsible for providing technical guidance?</p> <p>d. Personnel Incentive/Awards.</p> <p>(1) Are incentive programs, such as the beneficial suggestion program, sustained superior performance awards, quality step increases and used to reward employees and enhance morale?</p> <p>(2) Awards. An appropriate area for review is the record of awards for above-average performance. Consider the records of awards by: grade, individual, year, type of award. Superior efforts and accomplishments of others should receive appropriate recognition.</p> <p>e. Contracting Officer Appointments. Appointment of contracting officers should be commensurate with the volume and complexity of actions and the experience and qualifications of appointees. Evaluation of the process should include the following:</p> <p>(1) Does the office maintain a master file of active contracting officer warrants and necessary documents supporting the appointments?</p> <p>(2) Does the Director notify HQ by letter when a contracting officer is to be reassigned or employment is to be terminated? Are warrants returned to the PARC?</p> <p>(3) Are contracting officers acting within the authority of their appointment (requires input from both pre- and post-award team members)?</p> <p>(4) Does the DOC perform a review of the number and authority of contracting officer warrants each year IAW the guidelines set forth in CIL 98-8, paragraph 3?</p>			
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## Summary of Processes and Controls

### Category/Topic: Management/ Office Policy and Procedure

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Government Regulations and Instructions.</p> <p>(1) Do all employees have ready access to the FAR, DFARS, AFARS, FFARS, and local regulations? Are revisions distributed, implemented and discussed?</p> <p>(2) Are local supplementing directives kept to a minimum? When used, are they current and do they add value? Are duplications of or deviations from higher regulations avoided?</p> <p>(3) Do supplements implement headquarters requirements and/or further define local responsibilities or approaches?</p> <p>(4) Does the DOC have written operating procedures (this is not the same as local regs) that are adequate for use as training aids and buyer references?</p> <p>(5) Is the Federal Register reviewed regularly for latest FAC/DAC information? Is this information shared?</p> <p>(6) Are employees aware of the Defense Acquisition Desk-book? Is it used as a resource?</p> <p>b. Standards of Conduct. (DoD Directive 5500.7, 30 Aug 93 with changes 1 &amp; 2)</p> <p>(1) Have required contracting personnel filed annual OGE Form 450, Confidential Financial Disclosure? (Chapter 3, Para 3-200)</p> <p>(2) When individuals are required to complete an OGE Form 450, are job descriptions annotated with that requirement? (Chapter 7, Para 7-301b(2)).</p> <p>(3) Is there evidence of any gift, favor, entertainment, hospitality, transportation, loan, any other tangible item, and any intangible benefit - for example, discounts, passes and promotional vendor training - given or extended to military or civilian personnel, for which fair market value is not paid by the U.S. Government recipient? (Chapter 2, Para 2-300)</p> <p>(4) Are certifications of Procurement Ethics Training (Procurement Integrity) on file? (FAR 3.104-12)</p> <p>c. Management Control Process (Fraud, Waste and Abuse). In order to support the Internal Control Program (AR 11-2), the</p>			

## Summary of Processes and Controls

<p>following indicators of Fraud, Waste and Abuse should be checked:</p> <ul style="list-style-type: none"> <li>(1) Has the DOC established an internal control program IAW AR 11-2, Item XII to AL 96-1, and this document? Is there evidence that the DOC monitors the program?</li> <li>(2) Are self-inspections being accomplished for each division on an annual basis?</li> <li>(3) Is there a schedule that establishes dates of inspection, who will conduct the inspections, and due dates for inspection reports and responses?</li> <li>(4) Are Item XII to AL 96-1, the FORSCOM Contracting Management Review Guide, and previous CMR findings included in the self-inspection checklists?</li> <li>(5) Do self-inspection checklists contain out-dated and/or invalid items and references?</li> <li>(6) Are NAF contracts included in the self-inspection program?</li> <li>(7) Is there evidence of improper communications or social contact between contractors and government personnel?</li> </ul> <p>d. SPS/Office Automation.</p> <ul style="list-style-type: none"> <li>(1) Have the latest SPS version and latest Acquisition Regulation (AR) update been implemented?</li> <li>(2) Does the DOC use on-line and mass storage (e.g., CD ROM) technology to the maximum extent practicable for tasks such as market research, procurement coding, searching the ineligible/debarred bidder lists, regulatory research, and analytical tasks?</li> <li>(3) Is the DOC using attachment capability within SPS to store data in the electronic contract file?</li> <li>(4) Does the DOC use scanning technology or electronic means (email, file transfer protocol (ftp), interface software) to the maximum extent practicable for entering purchase requests, statements of work, technical exhibits, and other documents when provided in hard copy? (This does not apply to sub-installations.)</li> <li>(5) Has the Systems Administrator (SA) received the prescribed training for administration of the system? This training consists of a minimum of the following: <ul style="list-style-type: none"> <li>(a) The UNIX, Windows NT, Citrix Metaframe (when</li> </ul> </li> </ul>			
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## Summary of Processes and Controls

<p>operating with Terminal Server ), SPS-I and SYBASE/SQL operations; (SYBASE and SQL are optional but recommended).</p> <p>(b) Training in Client/Server operations (e.g. Windows NT, Windows NT Terminal Server Version, Citrix Metaframe, Citrix Metaframe Load Balancing Etc.); Terminal Server opens only when running Terminal Server System Architecture.</p> <p>(c) The SPS System Administrator Course;</p> <p>(d) Basic training in designing Cognos Ad Hoc Inquiries in SPS. (Also, advanced training in designing SQL and SYBASE Ad Hoc Inquiries is recommended.)</p> <p>(6) Does the DOC have a plan for training new users and refresher training for current users? As a minimum, current users should receive refresher training whenever a Version of SPS is issued. Scheduled periodic refresher training is preferred and can be provided by the Army Response Team and Fort Lee (SDCL-Lee). New users should receive training within 30 - 45 days of reporting to the DOC unless they have had previous SPS experience elsewhere. Does the DOC use the Computer Based Training Program (CBT) provided to each site to start new user training?</p> <p>(7) Are FSC codes used when entering purchase requests into the system? Are FSC assignments up-to-date?</p> <p>(8) Is the SA creating and maintaining a library of Cognos reports for Users to query the database?</p> <p>(9) If local clauses are used, is there a screening process for local clauses? Are local clauses created for one-time use deleted after usage? Has a deviation been granted for local clauses used repetitively? (SARD-KP msg R242200ZApr90, subject: Disposition of Regulatory Relief Task Force Recommendations on Nonstandard Solicitation/Contract Provisions and Clauses and AFARS 1.304(a)(4)(A)).</p> <p>(10) Are procedures established for collection and validation of user recommended changes to the system software?</p> <p>(11) Are daily backups and maintenance being performed?</p> <p>(12) Are procedures established for maintaining adequate supplies to support the system, including hardware and software maintenance?</p> <p>(10) Is there a copy of the SPS System Administration guide readily available and is it followed in performing required SA tasks?</p>			
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## Summary of Processes and Controls

<p>(13) Is documentation maintained on all system problems?</p> <p>(14) Are vendor names and addresses current? Are vendor files periodically inactivated as necessary?</p> <p>(15) Customer Support</p> <p>(a) Do customers of the DOC have access to Acquiline?</p> <p>(b) Have the customers with Acquiline access, been trained by qualified personnel?</p> <p>(c) Do customers transmit their requirements and make status inquiries via the terminals?</p> <p>(d) Has the DOC completed their Acquiline fielding plan? If Not, what percentage complete? Anticipated Completion date.</p> <p>(16) Has the SPS/CAPS-W interface been implemented? If so, is the interface being utilized? If not, why not?</p> <p>(15) Does the SA periodically archive closed contracts to tape or other storage media to optimize database size? Although there is no FORSCOM standard, the frequency chosen must balance database size and growth against potential need for previous year(s) data. (Applicable when archive capability is established by AMS)</p> <p>(17) Does the DOC have a SPS recovery plan in the event of catastrophic loss of SPS software or the SPS database?</p> <p>e. Reporting.</p> <p>(1) Are actions under \$25,000 reported on the DD Forms 1057 IAW DFARS 204.670-2?</p> <p>(2) Are DD Forms 350 completed timely for all other applicable actions?</p> <p>(3) Are other procurement reports submitted timely to HQ FORSCOM IAW established suspense's (Labor Standards Enforcement, Status Report of Specified Contract Audits, etc.)?</p> <p>f. Information Sharing.</p> <p>(1) Has the DOC established a Home Page on the World Wide Web (WWW)?</p> <p>(2) Is DOC preparing to implement SR-Web to receive online Bids and proposals at their website? If so, does the DOC have established procedures to ID which Solicitations/Purchases are exempt from Automating Posting to the Home? If No, does the</p>			
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Summary of Processes and Controls

<p>DOC manually post solicitations on the Home Page?</p> <p>(3) Does the DOC Home Page share information on Acquisition Reform (e.g., initiatives, lessons learned, reengineering results)?</p> <p>(4) Does the Home Page post metrics on DOC performance? Does it include at least the current FY? Trends?</p>			
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## Summary of Processes and Controls

### Category/Topic: Management/ DOC Special Programs

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Competition.</p> <p>(1) Is the installation meeting its competition goals? If not, why?</p> <p>(2) Are Justifications and Approvals (J&amp;A) prepared IAW AFARS 6.303-2? Are they approved IAW FAR 6.304 and FFARS 6.304?</p> <p>(3) Are J&amp;As accurate based on documentation in contract files?</p> <p>(4) Are reports submitted timely to the PARC? (FFARS 6.502)</p> <p>(5) Is a J&amp;A log maintained? Does the DOC have visibility of all non-competitive awards?</p> <p>(6) Are market surveys conducted? (FAR 7.101).</p> <p>b. Advance Acquisition Planning. (AFARS 7.1)</p> <p>(1) Has the Garrison Commander published an Advance Acquisition Plan (AAP)? (FFARS 7.104)</p> <p>(2) Is the AAP for the current fiscal year published and a copy of it submitted IAW FFARS 7.104? (See CIL 99-48, dtd 30 Sep 99, submission date changed to 15 Oct).</p> <p>(3) Has the DOC set up a reminder/follow-up system designed to encourage supported activities to submit requirements timely?</p> <p>(4) Does the installation have an Installation Acquisition Planning Board (IAPB)? (FFARS 7.104(S-101))</p> <p>(5) Does the IAPB meet at least quarterly? Does the DOC have evidence that an IAPB meeting is being conducted at least quarterly? (FFARS 7.104(S-101))</p> <p>(6) Does a member of the installation command group chair the IAPB with the DOC as alternate chairman? (FFARS 7.104(S-101))</p> <p>(7) Has the DOC established standard contracting lead times and/or firm cut-off dates for submission of purchase requests at fiscal year end? (FFARS 7.104(d))</p> <p>(8) Is the AAP system working? Were PRs received in a</p>			

## Summary of Processes and Controls

<p>timely manner; and if not, was follow up action timely?</p> <p>(9) Are contracts awarded and options processed in a timely manner?</p> <p>(10) Are solicitations for requirements type contracts issued in other than 4th quarter? Why not?</p> <p>(11) What has been done to relieve excessive workload in the fourth quarter? What is the percentage breakdown of contracts by quarter? Is it IAW FORSCOM Program Budget Guidance of 30 percent, 30 percent, 20 percent, and 20 percent for the respective quarters?</p> <p>c. Mobilization Planning. (FORMDEPS Vol III, Part 4 Installation Commanders Handbook).</p> <p>(1) Has the DOC established a Mobilization Contracting Support SOP?</p> <p>(2) Does the SOP contain an alert system?</p> <p>(3) Does the SOP address use of purchase cards and/or SF44s upon mobilization?</p> <p>(4) Has the DOC conducted pre-mobilization training?</p> <p>d. Unauthorized Commitments.</p> <p>(1) Does the office maintain a log of all ratification actions? Are unauthorized commitments properly and promptly processed?</p> <p>(2) Is FORSCOM Form 121-R, Request For Approval Of Unauthorized Commitment, or a locally developed form, used to process unauthorized commitments? (FFARS 1.602-3)</p> <p>(3) Is the interview and approval procedure by the chain of command followed? (AFARS 1.602-3-90, FFARS 1.602-3 and CIL 96-19)</p> <p>(4) Is DOC providing annual unauthorized commitment summary reports (broken out by dollar amounts, number of actions on hand, number ratified, and the number disapproved) to the PARC NLT 15 Oct for the previous year IAW FFARS 1-602-3(90)?</p> <p>(5) Did the contracting officer determine the action ratifiable? (AFARS 1.602-3-90(c))</p> <p>(6) Has there been a significant increase in UACs? If so, why?</p> <p>e. Customer Education.</p>			
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## Summary of Processes and Controls

<p>(1) Does the DOC have a customer education program? Is it responsive to customer's needs? Is it aggressive or passive?</p> <p>(2) Does the customer education program cover pertinent customer topics, such as unauthorized commitments, Competition in Contracting (CICA), and Justification and Approval documents, customer use of the government credit card for all purchases up to \$2500 and roles and responsibilities of a Contracting Officer's Representative (COR)?</p> <p>(3) Does the customer fully understand his responsibilities in providing requirements, including FSCs, to the DOC for contract execution?</p> <p>(4) Are the Installation Acquisition Planning Board (IAPB) meetings used to ensure all customers are aware and knowledgeable of their responsibilities?</p> <p>(5) What use has DOC made of the Customer Service Handbook provided in Sep 94? Is it used to enhance service to customers? Has it been tailored to meet special needs of the installation?</p> <p>(6) Does the DOC provide survey forms or questionnaires to customers to provide feedback on customer satisfaction? What other methods are being used to identify and remove barriers to customer satisfaction?</p> <p>0f. Secure Environment Contracting (SEC). (FORSCOM Reg 715-2, 15 Jun 90)</p> <p>(1) The SEC applies only to installations having active SEC contracts (i.e., Forts Bragg, Hood, Lewis, and the Army Atlanta Contracting Center (AACC)).</p> <p>(2) Does the DOC maintain a list of installation contracting personnel and legal advisors cleared to work on SEC actions? List should include name, position title, organization/office symbol, DSN, commercial and secure (STU III) telephone numbers.</p> <p>(3) Does the DOC have a current copy of all FORSCOM guidance on SEC? Have they issued supplemental guidance? Was FORSCOM furnished a copy?</p> <p>(4) Does the DOC have a secure facility for performing SEC actions? If not, is there a contingency plan in place for obtaining facilities when needed?</p> <p>(5) Does the DOC have access to secure communication</p>			
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## Summary of Processes and Controls

<p>and FAX?</p> <p>(6) Does the DOC maintain a roster of PARC personnel cleared to assist in SEC actions?</p> <p>g. Support of Non-appropriated Fund (NAF) Procurement.</p> <p>(1) Does the Director of Contracting allow and encourage the DOC staff to provide direction, advice, and assistance to the NAF procurement personnel IAW AR 215-4, para 1-7b and para 3-11?</p> <p>(2) Does the Director of Contracting encourage and support a teaming spirit between DOC personnel and NAF procurement personnel? How?</p> <p>(3) Does the Director of Contracting assign appropriated fund (APF) personnel to perform a biennial NAF procurement inspection? When was the last inspection performed?</p> <p>(4) Were APF contracting officers designated, in writing, by the DOC to handle and accomplish NAF acquisitions IAW AFARS 1.9003?</p> <p>(5) When needed, do DOC personnel accomplish NAF acquisitions that exceed the warrant level or expertise of the NAF contracting officer IAW AR 315-4, para 3-11 and AFARS 1.9003.</p> <p>(6) Was the Director of Contracting appointed, in writing, as a member of the local NAFI Council by the Garrison Commander or designee? (AR 215-1, 5-8 and 5-9)</p> <p>h. Freedom of Information Act (FOIA).</p> <p>(1) Does the DOC coordinate requests for information under the FOIA with the SJA and the installation FOIA official? (AR 25-55, para 5-104 and 1-508(e))</p> <p>(2) Does the DOC maintain a FOIA log to ensure proper handling and processing of each FOIA request? (AR 25-55, 1-301)</p> <p>(3) Are FOIA requests handled within the time constraints of AR 25-55, 1-503?</p> <p>i. Audit Tracking.</p> <p>(1) Is someone responsible for audit tracking and submission of reports if there is no cost/price analyst on the staff? Is this person aware of the requirements for audit tracking? Is there an SOP or Desktop procedure available?</p>			
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## Summary of Processes and Controls

<p>(2) Were DCAA audit findings resolved in a timely manner? If no, why not?</p> <p>(3) Is the Status Report on Specified Contract Audit Reports (RCS: DD-IG(SA) 1580) submitted timely and IAW DOD Directive 7640.2, AFARS 15.890-3, and FFARS 15.890-3?</p> <p>j. Centurion. Is DOC aware of the Centurion program at Appendix G?</p> <p>k. Contingency Contracting. FORSCOM Contracting Information Letter (CIL) 00-23, Contingency Contracting Officers and NCOs; FM 100-10-2, Contracting Support on the Battlefield.</p> <p>(1) Are military contracting personnel assigned to MTOE units and attached to the DOC for training and experience? Is a current Letter of Agreement or Memorandum of Agreement in place formalizing the attachment to the DOC (if needed). Do military contracting personnel maintain a close relationship with parent units by participating in unit training activities and deployments? Do key military contracting personnel provide training to assigned units on contingency contracting using Officer Professional Development sessions, etc...?</p> <p>(2) Are formal individual training plans on file and current for all military contracting personnel? Do military contracting personnel have Automated Development Plans submitted and approved by their supervisor?</p> <p>(3) Have applicable unit OPLANs been reviewed and current Contracting Support Plans (CSP) developed IAW FM-100-10-2 (Contracting Support on the Battlefield) (normally an appendix to the Logistical Annex)? Does the plan (s) address probable deployment scenarios? Does the CSP provide for training and supervision of Ordering Officer, Purchase Cardholders, and Contracting Officer Representative networks? Does the CSP address procedures for processing contracting requirements including resource management, approving officials, finance, and legal support?</p> <p>(4) Does the Contingency Contracting Office have on file the current SOPs/CSP from the next higher HQ? Have these SOPs been used to develop the current CSPs? Does the Contingency Contracting Office have field SOPs and Deployment</p>			
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## Summary of Processes and Controls

<p>SOPs developed and on file? Are After Action Reports required from past deployments and exercises and are they maintained on file?</p> <p>(5) Does the Contingency Contracting office maintain a copy of extracts from applicable MTOE for all military contracting personnel positions? Are copies of the current MAPL Sheets for Officers and NCOs on file?</p> <p>(6) Has a contingency contracting support kit(s) been prepared? Does it contain adequate equipment, supplies, and regulations to perform the contracting mission? Has adequate automation equipment been identified for deployment kits (computers, digital cameras, scanners, FAXs, etc...) as needed? Are there a sufficient number of kits prepared to support all deployment needs?</p> <p>(7) Are military contracting personnel current on all Soldier Readiness Check (SRC) requirements? Are military contracting personnel current on all military training requirements such as weapons qualifications, NBC qualifications, etc...)?</p> <p>l. Acquisition Reform. Is acquisition reform progressing within the DOC, particularly those issues identified in the DA Areas of Special Interest? What initiatives have been utilized?</p> <p>m. Strategic Planning/Metrics.</p> <p>(1) Has DOC established a plan that outlines a vision, goals, objectives and appropriate metrics, which supports FORSCOM and installation vision and goals?</p> <p>(2) Have metrics been institutionalized as part of an overall process of planning, assessment, adjustment, and reassessment?</p> <p>(3) Do the metrics track progress and performance against stated objectives of the strategic plan?</p> <p>(4) Does the DOC track cost of performance? Timeliness? Quality of output?</p> <p>n. Partnering.</p> <p>(1) Does DOC include a solicitation provision on Partnering</p>			
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## Summary of Processes and Controls

<p>when the resulting contract will benefit from a partnering arrangement.? (FFARS 33.204)</p> <p>(2) Does DOC share successes (CIL 99-1)?</p> <p>(3) Has DOC established at least one new formal partnering agreement (CIL 99-1)?</p> <p>o. Integrated Product Teaming.</p> <p>(1) What is the extent of the DOC's cross-functional teaming effort? Is there any evidence of timely coordination of support services, technology, and functional expertise in support of the overall contracting mission?</p> <p>(2) Has the DOC identified key players, roles, responsibilities, milestones for accomplishment of specific tasks, problem resolution techniques, and metrics necessary to determine the extent of change required at the installation, or the level of improvement necessary in the acquisition process at the installation?</p> <p>(3) Has the teaming process been incorporated into the Advanced Planning approach (i.e. has an effort been made to introduce the teaming concept at staff meetings, Advance Acquisition Plan meetings, etc.)? Have top-level installation managers been exposed to the teaming concept and have they become stakeholders?</p> <p>(4) For individual procurements, has the teaming effort been instituted early in the acquisition process?</p> <p>(5) Has the teaming concept been incorporated into internal training and the customer education program?</p> <p>(6) Have processes been examined in an attempt to fit the teaming concept into the way we do business?</p> <p>(7) Is there teams focus on early identification and resolution of problematic issues?</p> <p>(8) Has the teaming effort included industry input and support where needed?</p>			
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## Summary of Processes and Controls

### Category/Topic: Management/ Evaluation

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Fostering Change.</p> <p>(1) How has the DOC implemented new/recent programs (purchase card, JOC, Customer Service, Customer Education, etc.)?</p> <p>(2) Is the Director considered a leader with a vision, respected by peers and subordinates? Does the DOC understand and foster change? Is the DOC fully committed to implementing TQM/TAQ?</p> <p>b. Sub-Installations.</p> <p>(1) Directors of Contracting with sub offices are responsible for proper surveillance of those offices. The CMR team will examine the level of oversight and aid given by DOCs to the sub installations.</p> <p>(2) For DOCs with sub offices, the relationship with and assistance provided to those subs will be considered in determining the DOC's rating.</p> <p>c. Communications.</p> <p>(1) Are all DOC personnel encouraged to review CILs, ALs, PARC Newsletters, Procurement Alert Bulletins, and other contracting information? Do supervisors inform their personnel of necessary information? Does the Director share handouts, information and taskers from the annual FORSCOM Contracting Conference with Division Chiefs and other appropriate personnel? Is there free and open communication within the Directorate?</p> <p>(2) Is the DOC responsive to higher HQ, customers, and the chain of command in providing information timely and effectively? Is there free and open communication between Director and Command Group? Director and customers/visitors? Director and PARC?</p> <p>d. Facilities.</p> <p>(1) Is parking adequate? Is there a designated parking area for visitors? Is there a person assigned to greet visitors?</p>			

Summary of Processes and Controls

<p>(2) Is there sufficient room and privacy for buyers and contract administrators to conduct business? Is there an adequate conference/bid opening room?</p> <p>(3) What is the general appearance of the office, i.e., paint, office furniture, files, etc.? Is space sufficient?</p> <p>e. Morale. What is the climate of the DOC? High morale increases productivity. There are many factors that influence employee morale. Morale problems of any significance will soon be known to the reviewers and should be identified to management. Suggest morale builders, such as awards luncheons, monetary and non-monetary incentives, time off, etc.</p> <p>f. Findings/Repeat Findings. Summarize repeat findings from other reviews (CMR, AAA, IG, DA PMR, etc.) and new findings identified by team members.</p>			
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## Summary of Processes and Controls

### Category/Topic: Acquisition/ FACNET

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Is there an SOP on FACNET implementation, or is FACNET implementation incorporated in the contracting SOP? Is the strategy written and understood by buyers? Are items screened for FACNET applicability based on clear and written criteria?</p> <p>b. Is there a plan to progress toward the full FACNET goal of 75 percent of eligible small purchase actions being processed through Interim FACNET IAW FAR 4.505-2(a)(2) and 4.505-3(a)? Does the DOC track the percentage of actions processed via Interim FACNET? Does the computation properly count out excluded (FAR 4.505-4), excepted and exempted actions (FAR 4.506)? (NOTE: "Eligible actions" means those actions not excluded, excepted or exempted).</p> <p>c. When required, are notices posted in accordance with FAR Part 5? Are electronic means used to post notices? When using FACNET to process actions greater than \$25,000 and less than \$100,000, does the contracting file cite FAR 5.202(a)(13) as exemption from the notification requirement of FAR 5.101(a)(1)? Does the file cite FAR 5.301(b)(7) as exemption when the award notification requirement of FAR 5.301(a) applies?</p> <p>d. Are Contracting Officers aware of the provision of FAR 4.506(a)(1) for excepting specific purchases from the FACNET requirement? Do they document the file justifying exception?</p> <p>e. Do contracting officers use electric/electronic means (EDI, FAX, telegram) to inform offers of changes to solicitation closing dates where the time available until closing is insufficient (FAR 15.410)?</p> <p>f. When FACNET is used to process actions, do contracting officers set reasonable closing/due dates for receipt of quotes so as to optimize the number of quotes received? (The U.S. Army</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole.</i></p>		

Summary of Processes and Controls

<p>Procurement Research &amp; Analysis Office recommends a minimum of five (5) days.)</p> <p>g. Are source lists being maintained for non-FACNET acquisitions over the micro-purchase threshold IAW FAR 13.106-2(a)(9)(I)?</p>			
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## Summary of Processes and Controls

### Category/Topic: Acquisition/ Simplified Acquisitions

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Micro-purchases.</p> <p>(1) Are micro-purchases made using the Government-wide Commercial Purchase card to the maximum extent practicable? (FAR 13.201 and 13.301)</p> <p>(2) Is micro-purchase authority delegated to individuals who will be using the supplies and services being purchased, i.e., are the end users of the purchases being given the purchasing authority? (AFLG-PR memorandum, 3 Jan 95, subject: Purchase Less than \$2,500)</p> <p>(3) What is the percentage of micro-purchases made using the Card? The goal is for at least 95 percent of micro-purchases to be made by customers with the Card. (CIL 97-24)</p> <p>(4) When the DOC places micro-purchases for customers, is the file documented as to why purchase was not made by the end user? (AFLG-PR memorandum dated 3 Jan 95, subject: Purchases Less Than \$2,500.)</p> <p>(5) Do micro-purchases comply with the requirements of FAR Part 8, Required Sources of Supplies and Services? (FAR 13.201)</p> <p>(6) Are micropurchases equitably distributed among qualified suppliers? (FAR 13.202)</p> <p>(7) Is the practice of breaking down requirements to facilitate micropurchases avoided? (FAR 13.003(d))</p> <p>(8) Has DOC established master agreements to leverage buying power IAW Chief of Staff guidance in AFLG-PROM memorandum, 25 Mar 97, subject: Credit Card Expansion - Establishment of Master Agreements?</p> <p>b. Government-Wide Commercial Purchase Card, hereafter referred to as “the Card”.</p> <p>(1) Has the Director of Contracting established internal operating procedures for the program? (AFARS 13.9002(b)(i))</p> <p>(2) Has the Director designated an agency program coordinator? (AFARS 13.9002(b)(ii))</p> <p>(3) Has the Director approved the training course content? (AFARS 13.9002(b)(iv))</p>			

## Summary of Processes and Controls

<p>(4) Did all cardholders receive training and orientation covering the use of the Card prior to receiving authority under the program? (AFARS 13.9002(b)(v))</p> <p>(5) Are the delegations of authority issued by the Director? (AFARS 13.9002(b)(iii))</p> <p>(6) Did all cardholders receive Procurement Ethics training and comply with Procurement Integrity requirements? (AFARS 13.9004(c) and JER 7-300(b)(2))</p> <p>(7) How extensively is the card used as a payment method (DD Form 1556 training, DAPS printing, transportation, etc.)?</p> <p>(8) Are sufficient funds available prior to the purchase IAW local procedures?</p> <p>(9) Is competition sought by the cardholders when (a) they determine or have reason to suspect that the price may not be reasonable, or, (b) cardholder is purchasing a supply or service for which no comparable pricing information is readily available? (FAR 13.)202(a)(3))</p> <p>(10) Are purchases made within the cardholder's single purchase limit? (AFARS 13.9003(c))</p> <p>(11) Are cardholder Statements of Account (SOAs) reconciled within 5 working days of receipt? (AFARS 13.9002(d))</p> <p>(12) Are Billing Officials (BO) receiving the completed SOAs from the cardholders, reviewing, signing and forwarding the certified billing statement within 22 days from the end of the billing cycle? (AFARS 13.9002(e)) Are questioned items reported within 60 days as required by the contract? Are BOs complying with "Pay and authorize use of the card as a method of payment? (AFARS 13.9003(c))</p> <p>(13) Is the DOC performing annual surveillance of cardholder and BO statements and records to ensure adequate controls are in place and proper procedures are being followed? (FFARS 13.9002(c))</p> <p>(14) If the purchase exceeds the Micropurchase threshold, does the delegation of authority letter specifically authorize use of the card as a method of payment? (AFARS 13.9003 ( c )).</p> <p>(15) If the purchase exceeds the Micropurchase threshold, are cardholders using the card as a payment mechanism for purchase orders, orders against BPAs or to initiate calls or orders placed against existing contracts or agreements, and not as a stand</p>			
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## Summary of Processes and Controls

<p>alone procurement action? (AFARS 13.9001(b), 13.9003(c)(i) and (ii), and AL 96-3)</p> <p>(16) If the purchase exceeds the micropurchase threshold, are statutory clauses conveyed to vendors, purchases publicized, reserved for small businesses, and competed? (AFARS 13.9001(b) and AL 96-3)</p> <p>(17) Are payments against contracts exceeding the simplified acquisition threshold made only by DOC cardholders IAW CIL 96-16 (unless delegated to non-procurement personnel IAW HCA delegation dtd 23 May 96)?</p> <p>(18) Are non-procurement personnel with a single purchase limit that exceeds \$2500 provided additional training IAW AFLG-PR 1<sup>st</sup> End, 28 Aug 96, subject: AL 96-3?</p> <p>(19) Are BOs appointed IAW established procedures in DOD Comptroller memorandum, 17 Oct 96, subject: Purchase Card Reengineering Implementation Memorandum #1: Certifying Officer Guidance? Are required documents (appointment letter, signature card) provided to the appropriate disbursing office? Are properly certified billing statements provided to the disbursing office within 15 calendar days of receipt as required by the DFAS IMPAC SOP?</p> <p>(20) Do customers comply with Government Wide Commercial Purchase Card supply policy when using the card to purchase centrally managed NSN items? Are demands recorded for purchases of repair parts? Do hand receipt holders prepare DD Form 250, Materiel Inspection and Receiving Report to acknowledge and report purchases on nonexpendable items to the PBO? (DALO-SMP msg 261457Z Dec 96, subject: IMPAC Rules)</p> <p>(21) Have non-value added requirements (pre-approvals, formal purchase requests) been eliminated? Are cardholders provided screening tools such as FEDLOG or the AMDEF to determine appropriate sources of supply? Does program oversight use non-impeding audit techniques that do not delay the reconciliation/payment process? (SFAE-CSA-PPP memorandum, 28 Oct 96, subject: Streamlined Purchase Card Procedures)</p> <p>(22) Does the purchase card program comply with ASA(FM) memorandum, 24 Jan 97, subject: Streamlined Accounting for Micro Purchases Under the Government Purchase Card Program and DOD memorandum, 27 Mar 97, subject:</p>			
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## Summary of Processes and Controls

<p>Purchase Card Reengineering Implementation Memorandum #3? Are cards bulk-funded with a single line of accounting (unless waiver was approved)? Are cardholders/BOs using the Army's automated Purchase Card Management System (PCMS)? Are BOs using Pay and Confirm procedures?</p> <p>(23) Are APCs using First Link software and On-Line Access and/or C.A.R.E. to set up/maintain accounts, obtain reports, and monitor cardholder/BO activity?</p> <p>(24) If using Accommodation (Visa) Checks, are procedures in DOD memorandum, 5 Aug 97, subject: Purchase Card Reengineering Implementation Memorandum #5: Accommodation Checks followed?</p> <p>(25) Are cardholder records annotated to justify broad Merchant Category Code (MCC) assignments? (USAAA Report #AA 98-261)Confirm" instructions?</p> <p>c. Standard Form 44.</p> <p>(1) Were ordering officers appointed in writing by the Director IAW AFARS 1.603-1(2) and 1.603-1-90(c)?</p> <p>(2) Are ordering officers used only for the purpose set forth at AFARS 1.602-2-91(b)?</p> <p>(3) Is there a file of appointment memorandums and justifications IAW AFARS 1.602-2-91(d)(ii)?</p> <p>(4) Do the appointment letters comply with AFARS 53.9002?</p> <p>(5) Have ordering officers received required orientation and instructions IAW AFARS 1.602-2-91(c)(1)?</p> <p>(6) Is the number of ordering officers excessive? (AFARS 1.603-1(3))</p> <p>(7) Is the SF Form 44 authority limited to \$2,500 (except aviation fuel and oil purchases, overseas transactions, and purchases in support of intelligence operations, which do not exceed the simplified acquisition threshold)? (DFARS 213.306(a)(1))</p> <p>(8) Was the purchase made on the spot, over-the-counter, and away from a purchasing office IAW FAR 13.306?</p> <p>(9) Were there one delivery and one payment IAW FAR 13.306(a)(3)?</p> <p>(10) Are SF Form 44s being controlled and consecutively numbered using an appropriate numbering system in accordance</p>			
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## Summary of Processes and Controls

<p>with local procedures?</p> <p>(11) Was each ordering officer inspected at least once each year IAW AFARS 1.602-2-91(c)(2)?</p> <p>(12) Are ordering officer appointments terminated in writing when individuals are reassigned or employment is terminated IAW AFARS 1.602-2-91(c)(3)?</p> <p>d. Actions/Determinations Generally Applicable to Simplified Acquisition Procedures.</p> <p>(1) Are simplified acquisition procedures utilized for those actions between \$2,500 and \$100,000 IAW FAR 13.003(a)?</p> <p>(2) Are supplies and services acquired from those mandatory sources identified at FAR Part 8 and IAW FAR 13.003(a)(1)?</p> <p>(3) Are all actions greater than \$2,500 and less than \$100,000 set-aside for small business IAW with FAR 13.003(b)(1), unless the procedures at FAR 19.1006 apply?</p> <p>(4) Was DD Form 2579, Small Business Coordination Record, properly completed and coordinated with the activity's Small and Disadvantaged Business Utilization Specialist for all requirements estimated over \$10,000 if not set aside for small business concerns IAW DFARS 219.201(c)(9)?</p> <p>(5) Where the requirements of FAR 17.2 are met, are options being included in Requests for Quotation (RFQ) and Purchase Orders (PO) where they would result in lower costs to the Government? Does the aggregate value of the options remain at or below the simplified acquisition threshold IAW FAR 13.106(1)(e)?</p> <p>(6) Are contingency statements (Subject to Availability of Funds (SAF)) being removed or does the file contain certification of funds prior to receipt of supplies/services IAW FAR 32.703-2(c)?</p> <p>(7) Are deadlines for submission of responses to solicitations considered reasonable IAW FAR 5.203(b)?</p> <p>(8) Does the file contain documentation to support the basis of the contract award decision IAW FAR 13.106-3(b)(3) (only one source and/or other than price)?</p> <p>(9) Have Government property clauses been excluded where the cost of the item to be repaired does not exceed the simplified acquisition threshold IAW FAR 45.106(e)?</p> <p>(10) Has the clause FAR 52.213-1, Fast Payment Procedure,</p>			
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## Summary of Processes and Controls

<p>been included in the solicitations/contracts when conditions at FAR 13.402?</p> <p>(11) Are the POs issued on a fixed price basis IAW FAR 13.302-1(a)?</p> <p>(12) Have specific quantities been cited on the POs for supplies and services ordered IAW FAR 13.302-1(b)?</p> <p>(13) Does the PO have a definite calendar date for delivery or contain a determinable date by which performance of services is required? (FAR 13.302-1(b)(2))</p> <p>(14) Have unpriced POs been issued only when they do not exceed the simplified acquisition threshold ?</p> <p>(15) Does the unpriced PO indicate either a monetary limitation for each line item or for the total order IAW FAR 13.302-2(c)?</p> <p>(16) Was a discount offered and included on the PO but not considered for evaluation? (FAR 13.302-1(b)(5))</p> <p>(17) Are the conditions applicable at FAR 13.302-1(c) present to allow unsigned electronic POs?</p> <p>(18) Are POs being awarded within CALT guidelines established by the DOC?</p> <p>(19) Are standard industry classification codes and small business size standards included IAW FAR 19.303(a)?</p> <p>(20) Have DD Forms 350 been completed for all actions exceeding \$25,000 IAW DFARS 204.670-3?</p> <p>(21) Are the clauses/provisions required by FAR 22.8 for Equal Opportunity, FAR 22.13 for Special Disabled and Vietnam Era Veterans, and FAR 22.6 for Walsh-Healey Public Contracts Act included as applicable for purchases over \$10,000?</p> <p>(22) Are the clauses required by FAR 22.1408, Affirmative Action for Handicapped Workers, included when the PO is expected to exceed \$2,500?</p> <p>(23) If the quote was oral, does the file contain the names of the other vendors that were contacted and the prices, terms and conditions that they quoted? (FAR 13.106-3(b)(i))</p> <p>(24) If the quote was written, does the file contain an abstract that shows prices, delivery, references to printed price lists, the vendors contacted and other pertinent data? (FAR 13.106-3(b)(2))</p> <p>(25 ) Was notification to unsuccessful suppliers given when requested IAW FAR 13.106-3(c)?</p> <p>(26) Has termination or cancellation of POs been</p>			
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## Summary of Processes and Controls

<p>accomplished IAW FAR 13.302-4(a)(2) and FAR Part 49?</p> <p>e. Supply Purchases.</p> <p>(1) Are required sources utilized where possible - Federal Prison Industries (UNICOR) (FAR 8.001(a)(1)(iii)) or Committee for Purchase From People Who are Blind or Severely Disabled (FAR 8.001(a)(1)(iv)), and is the Schedule of Products Made in Federal Penal and Correctional Institutions on hand? (FAR 8.602(a))</p> <p>(2) Do orders authorizing a quantity variation contain the clause at FAR 52.211-16? Is the item something that can have a variation in quantity?</p> <p>f. Service Purchases.</p> <p>(1) Does the PO contain the applicable clauses required by FAR 22.1006?</p> <p>(2) Was an SF 98 prepared IAW FAR 22.1008 if the installation was not under Blanket Wage Program for services estimated to exceed \$2,500:</p> <p>(a) Was Notice of Intent SF Form 98, Notice of Intention to make a Service Contract and Response to Notice, submitted timely to the U. S. Department of Labor IAW FAR 22.1008-7?</p> <p>(b) Were the incumbent contractor and its employees' collective bargaining agent both given notification IAW FAR 22.1010(a)?</p> <p>(c) Was SF Form 99, Notice of Award Contract, submitted when required IAW FAR 22.1017?</p> <p>(d) Was the SF 98 a part of the PO file and the wage rate included in the PO?</p> <p>(3) Does the PO cross fiscal years? (FAR 37.106 and FAR 32.703-3)</p> <p>(4) Does the PO contain the clauses required by FAR 37.110, when applicable?</p> <p>(a) FAR 52.237-1 Site Visit</p> <p>(b) FAR 52.237-2 Protection of Government Buildings, Equipment, and Vegetation</p> <p>(c) FAR 52.237-3 Continuity of Services</p> <p>(5) Does the agency have specific statutory authority to acquire personal services?</p> <p>(6) Do POs for lease of motor vehicles comply with FAR</p>			
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## Summary of Processes and Controls

<p>8.11?</p> <p>(7) Are performance specifications being implemented in lieu of military specifications and standards where practicable IAW Secretary of Defense memorandum dated 29 Jun 94, subject: Performance-Based Service Contracting (PBSC) Implementation?</p> <p>h. Construction Purchases.</p> <p>(1) Does the Purchase Request exceed \$2,000? If so, was the solicitation issued electronically or by a written solicitation IAW FAR 13.106-1(d)?</p> <p>(2) If more than \$2,000, were the instructions in FAR Part 36 followed?</p> <p>(3) Are the clauses required by FAR 36.5 included in the PO?</p> <p>(4) Are the labor clauses required by FAR 22.407 included in the PO?</p> <p>(5) Are the wage rates included in the PO if over \$2,000?</p> <p>i. Blanket Purchase Agreements (BPA).</p> <p>(1) Did the contracting officer review a sufficient random sample of the BPA files at least annually to ensure authorized procedures are being followed? (FAR 13.303-6(a))</p> <p>(2) Were the names of individuals authorized to purchase under the BPA identified by organization and the dollar limitations for each individual furnished to suppliers? (FAR 13.303-3(a)(4))</p> <p>(3) Are requirements split to preclude exceeding the monetary limitations? (AFARS 13.205 (b)(ii))</p> <p>(4) Does the BPA identify the commodity being purchased in general terms, reference a specific period (not to exceed three (3) years) and stipulate an aggregate amount IAW FFARS 13.203-1(j)(1)?</p> <p>(5) Are calls equitably distributed among suppliers with BPAs ?</p> <p>(6) Are clauses referenced at DFARS 213.507 included?</p> <p>(7) Is there a statement informing the supplier how to submit invoices? (FAR 13.303-3(a)(6))</p> <p>(8) Have the individuals authorized to place calls under BPAs been trained and oriented IAW AFARS 13.204-90(b)?</p> <p>j. Federal Supply Schedules.</p> <p>(1) Was the DD Form 1155, Order For Supplies Or Service used to place delivery orders (DO) against Federal Supply Schedules? (DFARS 208.405-2(1))</p>			
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## Summary of Processes and Controls

<p>(2) Were oral orders placed within the simplified purchase threshold? (DFARS 208.405-2(2)(i))</p> <p>(3) Did the contractor agree to provide a delivery ticket for each shipment IAW DFARS 208.405-2(2)(ii)?</p> <p>(4) Was inspection of supplies done at destination unless an exception was made IAW FAR 8.405-3(a)?</p> <p>(5) In a case of nonperformance, did the contracting officer proceed IAW FAR 8.405-4?</p> <p>(6) When an order was terminated for default, was the schedule-contracting officer notified? (FAR 8.405-5(a)(1) or FAR Part 49)</p> <p>(7) Was repurchase effected and excess costs, if applicable, assessed on the defaulted schedule contractor? (FAR 8.405-5(a)(3))</p> <p>(8) Prior to termination for convenience under FAR Part 49, was an effort made to enter into a “no-cost” cancellation agreement with the contractor? (FAR 8.405-6(b))</p> <p>k. Modifications (MODS).</p> <p>(1) Does the aggregate amount of all MODs and the PO exceed the simplified acquisition threshold?</p> <p>(2) When the required clauses were not included in the PO, were they incorporated by bilateral modification? (DFARS 213.503(d)(ii) and 213.507(a)(ii))</p> <p>(3) For mod actions, which resulted in an increase in price, were adequate funds certified available prior to the contracting officer's execution of the mod? (FAR 43.105(a))</p> <p>(4) Was appropriate authority for the mod cited in block 13 of the SF 30? (DFARS 213.503(d)(i)(B)(4))</p> <p>(5) Is the mod issued IAW the Changes clause at FAR 52.243-1 for fixed-price supplies? FAR 52.243-1, Alt I for services? FAR 52.243-5, for construction contracts not expected to exceed the applicable simplified acquisition threshold at FAR Part 13? If so, is there a supplemental agreement to finalize the equitable adjustment required by the change? (FAR 52.243-1)</p> <p>(6) If the mod was bilateral, did both the contractor and the contracting officer IAW FAR 43.103(a) sign it?</p> <p>(7) If the mod was unilateral, did it include the contractor's verbal or written agreement in lieu of signature IAW DFARS 213.503(d)(i)(B)?</p> <p>(8) Are administrative MODs used to correct typographical</p>			
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## Summary of Processes and Controls

<p>mistakes, change the paying office, or change the accounting and appropriation data IAW FAR 43.101?</p> <p>(9) If the MOD increased or decreased funds was the mod a supplemental agreement? (FAR 43.103(a)(1))</p> <p>(10) If the MOD is notifying the contractor of a partial or total termination, is the mod unilateral IAW FAR 43.103(b)(4)?</p> <p>l. Closeout.</p> <p>(1) Does the file contain only one copy of each document? (DFARS 204.805-(4))</p> <p>(2) Is there evidence of final payment and/or receipt of property? (FAR 4.804-1(a)(1) and AR 25-400-2, Table B-102)</p> <p>(3) Are files stored, handled, and disposed of IAW FAR 4.805?</p> <p>m. Test Program for Certain Commercial Items. (Subpart 13.5) (Authority expires on 1 January 2002)</p> <p>(1) Did the results of market research indicate that there is a reasonable expectation that only commercial items will be offered? (FAR 13.500(a))</p> <p>(2) Are the simplified procedures authorized by FAR 13.500(b) being used to the maximum extent practicable?</p> <p>(3) Are sole source acquisitions justified in writing and approved at appropriate levels:</p> <p>(a) Proposed contracts exceeding \$100,000 up to \$500,000 certified by the contracting officer (FAR 13.501(a)(2))</p> <p>(b) Proposed contracts exceeding \$500,000 approved by the competition advocate for the procuring activity (FAR 13.501(a)(2)(ii))</p> <p>(4) Does the file contain a brief description of the procedures used in awarding the contract? (FAR 13.501(b))</p>			
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## Summary of Processes and Controls

### Category/Topic: Acquisition/ Formal Contracts

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Acquisition Planning</p> <p>(1) Did the DOC submit an Installation Advance Acquisition Plan to HQ FORSCOM not later than 15 September of each year. Are contracts awarded within the contract administrative lead times (CALT) established by the DOC? (FFARS 7.104(d) (1).</p> <p>(2) Have the customers been advised/educated regarding when and what they are required to submit to the DOC for effective and timely contracting? (AFARS 7.104-90(d)) Does the DOC take adequate corrective action when the customer doesn't comply?</p> <p>b. General</p> <p>(1) Are there any indications that contractors/offerors are not receiving impartial, fair and equitable treatment to include professional courtesy? (FAR 1.602-2(b))</p> <p>(2) Is the Contracting Division querying the Contract Administration Division for lessons learned and applying them prior to resoliciting recurring requirements?</p> <p>(3) Are the customers generally satisfied that the contracts as awarded reflect their requirements?</p> <p>(4) Do contracts comply with applicable laws/statutes, regulations? If not, have appropriate approvals/deviations been obtained, or for administrative requirements, has the file been appropriately documented?</p> <p>(5) For solicitations subject to availability of funds (SAF): (FAR 37.106 and 32.703-2)</p> <p>(a) Was the fund citation on the purchase request restricted by the statement "SUBJECT TO AVAILABILITY OF FY--FUNDS," and did the solicitation contain the clause at FAR 52.232-18, Availability of Funds IAW FAR 32.705-1/AFARS 1.602-2?</p> <p>(b) Was the SAF statement removed from the fund citation by authorized Resource Management personnel prior to the contracting officer giving the contractor written notice that funds</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole.</i></p>		

## Summary of Processes and Controls

<p>had become available? (AFARS 1.602-2)</p> <p>(c) Is there indication that the government accepted supplies or services before the contracting officer gave the contractor written notice that funds were available IAW FAR 32.703-2(c)?</p> <p>c. Contract File Management.</p> <p>(1) Do contract files contain the original of the signed contract and other pertinent documentation? (FAR 4.803)</p> <p>(2) Does documentation in the file constitute a complete history of the transaction? (FAR 4.801(b))</p> <p>(3) Is there a file for canceled solicitations? (FAR 4.801(c))</p> <p>d. Pre-award Actions/Determinations Generally Applicable to All Types of Contracts.</p> <p>(1) Does the file contain a citation of funds? (FAR 4.803)</p> <p>(2) Was the acquisition package received IAW Advance Acquisition Plan, if applicable? Did acquisition lead time allow sufficient time to satisfactorily complete the acquisition process? (AFARS 7.104-90(c))</p> <p>(3) Were purchase requests and supporting documents adequate when received by the DOC? Were inadequate purchase requests corrected or returned timely?</p> <p>(4) Were mandatory sources of supply considered IAW FAR Part 8?</p> <p>(5) Is there an approved acquisition plan in the contract file if required? Was the acquisition plan submitted at least 45 calendar days, or 60 calendar days if multifunction CA, prior to issuance of synopsis IAW AFARS 7.103, DFARS 207.103, and FFARS 7.103?</p> <p>(6) Is there adequate documentation to show why the particular contract type was selected? (FAR 16.103(d))</p> <p>(7) Does the file contain an approved J&amp;A IAW FAR 6.304? Other areas of compliance if procurement was accomplished using other than full and open competition:</p> <p>(a) Does the format comply with AFARS 6.303-2-90? Was it certified and approved at the appropriate level(s) IAW FAR 6.304, 6.303-1(b), and FFARS 6.3?</p> <p>(b) If only one source was solicited, was that limitation justified in the Justification and Approval (J&amp;A) document? The items in FAR 6.303-2(a)(6), (8), (9), and (11) must be addressed</p>			
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## Summary of Processes and Controls

<p>even when the exception cited is other than 10 U.S.C. 2304(c)(1).</p> <p>(c) When using 10 U.S.C. 2304(c)(1) (only one responsible source), was synopsis published and were bids and proposals received considered? (FAR 6.302-1)</p> <p>(d) Was a J&amp;A prepared when acquiring brand name products IAW FAR 6.302-1(c)?</p> <p>(e) When using 10 U.S.C. 2304(c)(2) (unusual and compelling urgency), was the J&amp;A forwarded to the appropriate approving authority within 10 workdays of contract award? Was verbal approval requested, received, and documented IAW FFARS 6.303-1(e)(ii)?</p> <p>(8) If the estimated requirement was over \$100,000, was it properly synopsized? (FAR 5.201 and 5.207)</p> <p>(9) If the requirement was estimated over \$100,000 and not synopsized, does the file reflect which exception is applicable to the action IAW FAR 5.202(a)?</p> <p>(10) If the requirement was synopsized, were at least 30 calendar days allowed for receipt of bids or proposals from the date of issuance of the solicitation IAW FAR 5.203(c) and 36-213-3(a)? If using EDI, was a reasonable amount of time allowed for receipt of bids or proposals? (U.S. Army Procurement Research and Analysis Office currently recommends 5 days.)</p> <p>(11) Is a copy of the publication of synopsis or reference thereto in the file IAW FAR 4-803(a)(4) and was the solicitation issued no sooner than 15 calendar days after that date IAW FAR 5.203(a)?</p> <p>(12) Does the contract file contain a solicitation mailing list (FAR 4.803(a)(5)) and evidence that the List of Parties Excluded from Procurement Programs has been checked to preclude soliciting listed firms IAW FAR 9.405(a) and (d)(i)?</p> <p>(13) Was DD Form 2579, Small Business Coordination Record, prepared and coordinated for all acquisitions exceeding \$10,000, except those restricted for exclusive Small Business participation (DFARS 219.20 (d) (9) (A)).</p> <p>(14) For acquisitions requiring synopsis, was the DD Form 2579 approved prior to transmitting the CBD synopsis notice? Is the solicitation mailing list attached to the DD Form 2579 and is there an indication of the size and disadvantaged status of the firms listed IAW AFARS 19.201(c)(9)(B)(1)?</p> <p>(15) Does the contract file contain adequate justification to</p>			
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## Summary of Processes and Controls

<p>substantiate the amount of the liquidated damage assessment IAW FAR 11.502(b)?</p> <p>(16) Is use of options adequately justified IAW FAR 17.205? If options are included in a sealed bid solicitation, is there an intent to exercise the option IAW DFARS 217.208?</p> <p>(17) Are the appropriate size standards and standard industrial classification codes included in all solicitations above the micro-purchase threshold IAW FAR 19.303(a)?</p> <p>(18) Was the solicitation prepared IAW FAR 14.201 or 15.204?</p> <p>(19) Was the clause at FAR 52.219-6, Notice of Total Small Business Set-Aside, included in the solicitation when the solicitation was synopsisized as restricted to small businesses IAW FAR 19.508(c)?</p> <p>(20) For set asides other than construction and services, was waiver obtained if the contractor did not manufacture the product or provide a product from a small business IAW FAR 19.502-2 (c).</p> <p>(21) If government-furnished property (GFP) was provided, was the appropriate government property clause included and was the GFP identified in the solicitation? (FAR 45.106 and 45.302-1)</p> <p>(22) If the solicitation involved material of a hazardous nature, was the solicitation prepared IAW the following:</p> <ul style="list-style-type: none"> <li>(a) Radioactive materials, FAR 23.601</li> <li>(b) Environmental objectives, FAR 23.704</li> <li>(c) Ozone Depleting substances, FAR 23.803</li> <li>(d) Toxic chemicals, FAR 23.906</li> </ul> <p>(23) Did solicitations receive legal review IAW AFARS 1.602-2(c)? (Examples of actions for which legal counsel should be sought: Determinations of minor informalities/irregularities, determinations to reject individual bids, determinations allowing withdrawal based on mistake, proposed award documents, J&amp;A, Acquisition Plans.)</p> <p>(24) Did the requesting activity review the solicitation for technical adequacy as part of the Solicitation Review Board (SRB) process? (FFARS 1.602-1-90)</p> <p>(25) Is the contract file documented to show that solicitations requiring review at HQ FORSCOM were forwarded as required IAW FFARS 1.602-1-90?</p> <p>(26) Are bids/proposals, which are received prior to bid</p>			
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## Summary of Processes and Controls

<p>opening/solicitation closing, kept secure IAW FAR 14.401 and 15.207?</p> <p>(27) Is the SF Form 1409, Abstract of Offers, or the OF 1419, Abstract of Offers - Construction completed and certified IAW FAR 14.403(a)?</p> <p>(28) Are bids/offers received after opening/closing correctly determined to be late and were the contract files documented to reflect the disposition and handling of late bids/offers IAW FAR 14.304 and 15.208?</p> <p>(29) Do contracts contain contractor signatures IAW FAR 4.102?</p> <p>(30) Were minor informalities/irregularities in the low responsive bid processed IAW FAR 14.405?</p> <p>(31) Are bidders given proper notice of suspected mistakes and required to verify their bids IAW FAR 14.407-1?</p> <p>(32) Were clerical mistakes apparent on the face of the bid corrected IAW FAR 14.407-2?</p> <p>(33) Are other alleged mistakes-in-bids before award handled IAW FAR 14.407-3, DFARS 214.407-3, and AFARS 14.407-3?</p> <p>(34) Did the contracting officer document the file to clearly establish the reason(s) for rejecting bid(s) IAW FAR 14.404-2?</p> <p>(35) In determining that prices offered are fair and reasonable, is consideration given to whether or not bids/offers are materially unbalanced IAW FAR 14.408-2(b) and FAR 15.404-1(g)</p> <p>(36) For negotiated actions exceeding \$100,000:</p> <p>(a) Did the appropriate authority approve the Pre-negotiation Objective Memorandum (POM) and Price Negotiation Memorandum (PNM)</p> <p>(b) Does the POM show that the contracting officer/negotiator was adequately prepared to enter into negotiations?</p> <p>(c) Does the POM show that the contracting officer conducted negotiations on all-important issues?</p> <p>(d) Does the POM show a clear understanding of the development of Most Probable Cost Estimate (MPCE) for cost reimbursement contracts? Was the selection decision based on the MPCE in the context of the contractor's offered price?</p> <p>(e) Does the PNM show clearly the trade-off analysis used and the rationale for selecting the best value for the government</p>			
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## Summary of Processes and Controls

<p>when evaluation is based on other than low cost technically acceptable?</p> <p>(f) Has DOC established POM and PNM procedures for all actions approved at DOC level?</p> <p>(g) Were the evaluation factors and their relative importance clearly stated in the solicitation IAW FAR 15.304? Is there a clear trail showing that the evaluation factors listed in the solicitation were followed through source selection plan to source selection statement?</p> <p>(1) Is past performance an evaluation factor in all competitively negotiated (FAR 15.304(c)(3)(i)) Assess how contracting officers use past performance in the source selection process.</p> <p>(2) Does the contract file contain a determination if past performance is not an evaluation factor? (FAR 15.605(ii))</p> <p>(3) Does the solicitation clearly alert offerors that their assessment of previous past performance will be made from input of past customers?</p> <p>(4) Is pre-award resolution of performance record discrepancies handled during negotiations?</p> <p>(5) If an agreement is not reached on rebutting statements, is the decision reviewed by one level above the contracting officer (FAR 42.1503(b))?</p> <p>(37) For each acquisition, was some form of cost or price analysis performed to determine reasonableness of price IAW FAR 14.408-2 and FAR 15.402?</p> <p>(38) For negotiated actions:</p> <p>(a) Was cost/price data obtained IAW FAR 15.403?</p> <p>(b) Was cost and pricing data obtained adequately evaluated? Is documentation included in the contract file?)</p> <p>(c) Was a Certificate of Current Cost or Pricing Data obtained?) If not, was exemption granted? If exemption was obtained, was price analysis performed to determine reasonableness of price and need for further negotiation?</p> <p>(d) Are lessons learned reports resulting from formal source selection acquisitions being forwarded IAW AFARS, Appendix AA, and Formal Source Selection, paragraph AA-107?</p> <p>(e) In negotiated acquisitions where award was made without written or oral discussions, does the file document the reason? If the solicitation states the intent to award without</p>			
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## Summary of Processes and Controls

<p>discussion and the decision is reversed, is there documented rationale for the reversal)? Was a combined POM/PNM developed IAW FFARS 15.406-1 (c).</p> <p>(f) In negotiated acquisitions, are all offerors in the competitive range given an opportunity to submit a final proposal revision IAW FAR 15.307(b)?</p> <p>(g) On negotiated procurements, is the file documented why sealed bidding was not used IAW FAR 6.401?</p> <p>(h) Is quality stated as an evaluation factor in every negotiated acquisition?</p> <p>(i) For procurements exceeding \$100,000 using other than sealed bidding procedures, were procurement integrity certificates requested?</p> <p>(j) Are pre-award and post-award notices to unsuccessful offerors provided ?</p> <p>(k) For negotiated actions of \$100,000 or less, does the file contain price negotiation memorandums?</p> <p>(l) Was field-pricing support requested for fixed-price proposals exceeding \$500,000, for cost-type proposals exceeding \$500,000 from offerors with significant estimating system deficiencies, or cost-type proposals exceeding \$1M from offerors without significant estimating system deficiencies?</p> <p>(m) Were the recommendations of the cost/price analyst and auditors used by the contracting officer in developing a pre-negotiation position and conducting negotiations? If not, was the rationale for not doing so adequately documented in the contract file?</p> <p>(39) If applicable, was contractor's "make or buy" program and proposed subcontracts reviewed IAW FAR 44.202?</p> <p>(40) Are prompt payment discounts offered made a part of the award IAW FAR 14.408-3(a)?</p> <p>(41) Were economic price adjustment clauses, when proposed, evaluated in accordance with FAR 14.408-4(a)?</p> <p>(42) For other than construction, was EEO clearance obtained IAW FAR 22.805 for award of contracts and subcontracts over \$1 million?</p> <p>(43) Does the file contain documentation to support affirmative determination of responsibility by the contracting officer IAW FAR 9.103(b)?</p> <p>(44) Are files documented so that it is clear how and why a</p>			
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## Summary of Processes and Controls

<p>particular source was selected for award IAW FAR 14.408-7?</p> <p>(45) On awards over \$3 million, is the file documented to show that Congressional notification was made IAW FAR 5.303 and DFARS 205.303?</p> <p>(46) Was award withheld to allow five business days from receipt of notification to unsuccessful offerors for small business size protest IAW FAR 19.302(d)(1)?</p> <p>(47) Are contract awards exceeding \$25,000 that are likely to result in award of subcontracts synopsisized in the Commerce Business Daily IAW FAR 5.301?</p> <p>(48) Were DD Forms 350 prepared timely and accurately on all actions in excess of \$25,000 IAW DFARS 204.670-2 and 204.670-3?</p> <p>(49) Were amendments to IFBs/RFPs issued in sufficient time to be considered by offerors/bidders in submitting or modifying their bids/offers IAW FAR 14.208(b) and 15.206?</p> <p>(51) Were procurement integrity clauses included in solicitations/contracts if the value exceeded the simplified acquisition threshold? (FAR 3.104-9)</p> <p>(52) Does the contract file contain the required lease versus purchase analysis IAW FAR 7.4 and DFARS 207.401?</p> <p>(53) If bid samples/descriptive literature were required by the solicitation, does the file contain justification? (FAR 14.202-4(d) and 14.202-5(c)) Are waivers of descriptive literature IAW FAR 14.202-5(e)?</p> <p>(54) Is FAR 52.204-3, Taxpayer Identification, included in the solicitation and provided to the payment office IAW FAR 4.203?</p> <p>e. Service Contracts.</p> <p>(1) Did the contracting officer determine the services to be non-personal, IAW FAR 37.101 and 37.104? In doubtful cases, did the contracting officer obtain legal review and document the file IAW FAR 37.103?</p> <p>(2) In contracting for services estimated to exceed \$2,500:</p> <p>(a) Was Notice of Intent SF Form 98 submitted timely to the U.S. Department of Labor (DOL) IAW FAR 22.1008-7, DOL's schedule for the Blanket Wage Program, or Wage Determination On Line program instructions?</p> <p>(b) Were the incumbent contractor and its employees'</p>			
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## Summary of Processes and Controls

<p>collective bargaining agent both given notification IAW FAR 22.1010(a)?</p> <p>(c) Was SF 99, Notice of Award, submitted when required IAW FAR 22.1017?</p> <p>(d) Are solicitations rated under the Defense Priorities and Allocations System IAW FAR 11.603?</p> <p>(3) Mortuary Services.</p> <p>(a) Were solicitation provisions and contract clauses set forth in DFARS 237.7004 included?</p> <p>(b) Is the area of performance clearly defined IAW DFARS 237.7002?</p> <p>(c) Was the mortuary contract distributed IAW DFARS 237.7003?</p> <p>(d) Did the contracting officer and the mortuary officer prior to award IAW AR 638-2 inspect the contractor's facility?</p> <p>(4) Laundry and Dry Cleaning Services. Did the solicitation include the clauses and provisions prescribed by DFARS 237.7102?</p> <p>(5) Direct Health Care Services.</p> <p>(a) Was the requirement approved IAW DFARS 237.104(b)(ii)?</p> <p>(b) Was the solicitation prepared IAW FAR 37.401 ?</p> <p>(c) Were applicable compensation pay caps observed IAW guidance at FAR 31.205-6 and DFARS 231.205-6?</p> <p>(6) Were utility solicitations prepared IAW FAR Part 41?</p> <p>(7) When severable contracts for services are funded by annual appropriations, <i>does the contract period exceed one year (without regard to any option to extend the period of the contract)? (98-DEV-1 to FAR 32.703)</i></p> <p>(8) Does the solicitation include a complete copy of the provision that requires offerors to identify their taxpayer identification number, corporate status, and common parent IAW FAR 4.203?</p> <p>(9) Are performance specifications implemented instead of military specifications and standards where practicable IAW Secretary of Defense memorandum dated 29 Jun 94, subject: Performance-Based Service Contracting (PBSC) Implementation?</p> <p>f. Commercial Activities.</p> <p>(1) For cost competition studies, was the sealed, dated, in-</p>			
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## Summary of Processes and Controls

<p>house cost estimate submitted to the contracting officer by the time established for receipt of initial proposals or by bid opening IAW FAR 7.304(b)(3)?</p> <p>(2) For cost competition studies, was the requirement synopsisized at least three times in a 90-day period with a minimum interval of 30 calendar days between each synopsis or, for urgent requirements, at least two times in a 30-day period with a minimum interval of 15 calendar days between each synopsis IAW FAR 7.303(b)(1)?</p> <p>(3) Do acquisition procedures comply with FAR 7.304 and AR 5-20, Chapter 4, Section II OMB Circular No. A-76, Chapter 3, para G-J, DA Pam 5-20, Chapter 7.</p> <p>(a) Do Acquisition Plans comply with FFARS 7.103(a), and FAR 7.3?</p> <p>(b) Are solicitation documents prepared and submitted IAW FFARS 1.602-1-90(s-100), (S-102(i)), and FAR 7.3?</p> <p>(c) Are Acquisition Plans for multifunction CAs, including resolicitation of functions previously converted to contract, submitted to the HCA 45 days prior to issuance of the synopsis IAW FFARS 7.103(a)?</p> <p>(4) Are formal Source Selection procedures proposed for complex negotiated requirements? (FFARS 15.303 (a) (100).</p> <p>(5) Is a DOC representative actively involved in the planning/IPR for each CA requirement?</p> <p>(6) Were problems experienced with CA projects identified as lessons learned and forwarded to the PARC?</p> <p>g. Construction Contracts.</p> <p>(1) Did the acquisition include the following:</p> <p>(a) Purchase request, funded or inscribed and signed by the comptroller or his designee IAW AFARS 1.602-2?</p> <p>(b) If a high priority requirement, does the solicitation contain the statement at AFARS 1.602-2?</p> <p>(c) Adequate copies of specifications and drawings and a list of GFM/GFE?</p> <p>(d) Information regarding statutory cost limitations IAW FAR 36.205?</p> <p>(e) Suggested bid schedule? Do bid schedule deliverables and the IGE agree?</p> <p>(2) Were sealed bid procedures used IAW FAR 36.103?</p>			
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## Summary of Processes and Controls

<p>(3) For requirements exceeding \$100,000, does the file contain detailed IGEs IAW FAR 36.203(a)?</p> <p>(4) Are sealed IGEs filed with unopened bids until bid opening IAW DFARS 236.203?</p> <p>(5) Are IGEs marked “For Official Use Only,” and are the designations properly removed prior to the estimates being read and recorded IAW DFARS 236.203?</p> <p>(6) If a warranty other than that contained in federal, military or construction guide specifications applicable to a given construction project was included, did the Director approve use of the warranty? (DFARS 246.704)</p> <p>(7) Are liquidated damages included in all contracts over \$500,000, except cost-plus fixed fee contracts or where contractor cannot control the pace of work IAW DFARS 211.504(b)?</p> <p>(8) Does the file contain justification and a detailed formula showing how liquidated damages are determined IAW FAR 11.503?</p> <p>(9) Does the advance notice (synopsis) and the IFB/RFP contain the appropriate magnitude of the range of the construction project IAW FAR and DFARS 36.204?</p> <p>(10) If additive or deductive items were included, did the contracting officer determine and record in the contract file the firm amount of funds available for the project prior to bid opening IAW DFARS 236.303-70?</p> <p>(11) Were all bids evaluated on the basis of the same additive or deductive bid items IAW DFARS 236.303-70(C)(2)?</p> <p>(12) For construction projects expected to exceed \$1 million, except those awarded under FAR 19.5 and 19.8, does the solicitation contain the clause at FAR 52.236-1, Performance of Work by the Contractor, IAW FAR 36.501(b)?</p> <p>(13) Is there evidence in the file that bid bonds were reviewed for adequacy and acceptability of surety IAW FAR 28.102?</p> <p>(14) Was an SF 1442 used for award IAW FAR 36.701(b)?</p> <p>(15) Is the file documented that performance evaluations of construction contractors were used as required by DFARS 236.201(c)(2) before selecting fully qualified responsible contractor for award above \$1 million?</p> <p>(16) If any part of the project is subject to a statutory limitation, does the bid schedule reflect those items subject to</p>			
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## Summary of Processes and Controls

<p>statutory limitations IAW FAR 36.205(b)?</p> <p>(17) If separate performance periods apply to various parts of the work, is it clear if liquidated damages will be assessed on the total performance period or separately IAW FAR 52.211-12, Alt I?</p> <p>(18) Were JOC solicitations prepared IAW AFARS 17.90?</p> <p>h. 8(a) Contracts.</p> <p>(1) Do 8(a) contracts contain written certification from the SBA of the 8(a)'s competency to perform IAW FAR 19.800(c)?</p> <p>(2) Do 8(a) contract formats comply with FAR 19.811? Do they contain required special clauses (FAR/DFARS 19.811-3)?</p> <p>(3) Were awards based on competition, as applicable, IAW FAR 19.805-1?</p> <p>i. Supply Contracts.</p> <p>(1) Were required Buy American Act and Balance of Payments Program evaluated properly IAW DFARS 225.103 and 225.302 respectively?</p> <p>(2) If electronics bids are authorized, does the solicitation specify electronic commerce methods IAW FAR 14.202-8?</p> <p>(3) Are supply requirements estimated to exceed \$100,000 solicited as total small business set-asides only when offers are expected from two or more small business concerns offering the products of different small business concerns? (FAR 19.502-2)(b))</p> <p>j. Information Technology (IT) Procurements (FAR Part 39).</p> <p>(1) Were all purchase requests certified by the IMO of the applicability of 10.U.S.C. 2315 and one or more of the specific exemptions? (AFARS 39.001-70)</p> <p>(2) Is the certification supported by a written determination describing the rationale for the certification? (AFARS 39-001-70)</p> <p>(3) Does the DOIM or DCSIM endorse the certification? (AFARS 39.001-70)</p> <p>k. Cost Type Contracts (Cost Plus Award Fee).</p> <p>(1) Has the contracting officer made the required determination IAW FAR 16.301-3?</p> <p>(2) Was appointment of the Award Fee Deter-mining</p>			
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## Summary of Processes and Controls

<p>Official made IAW AFARS 16.404-2?</p> <p>l. Time and Material Contracts.</p> <p>(1) Did the Director or chief of the office IAW FAR 16.601(c) execute the required determination?</p> <p>(2) Does the contract contain a ceiling price, and is the contractor advised that he exceeds the ceiling price at his own risk IAW FAR 16.601(c)? Did the contracting officer justify any subsequent changes in the ceiling price IAW FAR 16.601(c)?</p> <p>(3) Does the contract file document justification for reducing or waiving the five- percent withholding of payments as required by FAR 52.232-7(a)(2)?</p> <p>m. Contracting Administrative Lead-Time (CALT). Is the contracting activity meeting the CALT goals established by the Director of Contracting IAW FFARS 7.104(d)?</p> <p>n. Cost and Price Analysis. The price/cost analyst supports the contracting officer in all aspects of acquisition planning, solicitation formation, and the evaluation and/or negotiation process. The responsibilities of this position include actively participating in evaluation of offers and contract negotiations when deemed necessary by the contracting officer. For those DOCs that do not have a cost/price analyst, has DOC established procedures describing how cost, price, and cost realism analyses will be performed?</p> <p>(1) Is the price/cost analyst reviewing those portions of solicitations and evaluation plans that impact evaluations and negotiations, and providing input/recommendations to the contracting officer? This should include not only solicitation provisions but also contract type selection, extent of certifiability of cost and pricing data required, extent of field pricing required, weighting schema for source selections, and the adequacy of any technical exhibits which impact contract pricing.</p> <p>(2) Is the price/cost analyst participating as an active member of the evaluation/negotiation team?</p> <p>(3) Is the price/cost analyst performing thorough evaluation of proposals, addressing each of the cost elements and/or price as appropriate in their analysis? Is cost, price, or cost realism analysis used as appropriate to the situation? Does the analyst</p>			
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## Summary of Processes and Controls

<p>make logical, well-supported recommendations on the basis of the evaluation? (FAR 15.4 and DFARS 215.4)</p> <p>(4) When the price/cost analyst performs cost analysis, is profit evaluated in accordance with DFARS 215.4? If profit or fee is evaluated using Weighted Guidelines methodology, are the weights assigned appropriate for the type of contract, risk and other factors?</p> <p>(5) Is the price/cost analyst submitting the pricing report in a timely manner? Is the report complete, accurate and comprehensible? Do data and/or reasonable assumptions support all findings and recommendations? Does the report consolidate the findings and recommendations from the other reports such as audit and technical reports into a single, integrated advisory report? Are tables and schedules included as appropriate to aid in developing the negotiation position(s)?</p> <p>(6) Is the price/cost analyst assisting customers in the development of independent government estimates (IGEs)? Is the analyst assisting the contracting officer in evaluating IGEs for effectiveness?</p> <p>(7) On the basis of the above evaluations, is overall price/cost analyst support adequate?</p> <p>o. Regionalization.</p> <p>(1) Is documentation at the satellite site complete reflecting the request for a waiver and copy of the waiver for acquisitions over \$500,000.</p> <p>(2) Does the Regional center adequately document the granting of waivers for acquisitions greater than \$500,000 to the satellite sites?</p> <p>(3) Does Regional centers documentation fully identify all potential “regionalization” candidates?</p> <p>(4) Has the Regional center submitted quarterly reports to the PARC?</p> <p>(5) Has the Regional center updated their Advance Acquisition Plan to reflect regionalization candidates?</p>			
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## Summary of Processes and Controls

### Category/Topic: Acquisition/ Contract Administration

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>Post-Award Actions Applicable to all Contract Types.</p> <p>a. Contract File Management.</p> <p>(1) Are contract files and folders properly set up and identified? (FAR 4.802)</p> <p>(2) Does the file contain a copy of the contract distribution list showing offices that should receive copies of modifications? (FAR 4.201)</p> <p>(3) Does the file contain the original, authenticated or conformed copies of official contractual documents? Are record copies of correspondence or memoranda signed? (DFARS 204.802)</p> <p>(4) Are contract files readily accessible to principal users? (FAR 4.802)</p> <p>(5) Were completed contracts closed out IAW FAR 4.804 and DFARS 204.804-1, and within the specified time frames?</p> <p>(6) Are completed contract files held in the office for a period of 12 months after completion? (DFARS 204.805)</p> <p>b. Documentation.</p> <p>(1) Does the contract file contain evidence of the contractor's receipt of contract/Notice of Award?</p> <p>(2) Were notices, contracting officer decisions, and other time-sensitive documents sent certified mail, return receipt requested? (FAR 9.406-3, FAR 11.403, FAR 33.211)</p> <p>(3) Were contractor submittals required by contract received and approved and the file so documented? (FFARS 36.505(100))</p> <p>(4) Is documentation of contractor performance being provided to the contracting officer by the COR as required by AFARS 53.9001.2(d), if applicable?</p> <p>(5) Does the file contain sufficient documentation in support of each contractual action? (FAR 4.801)</p> <p>c. Post-Award Conferences.</p> <p>(1) Was a pre-construction or post-award orientation</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole.</i></p>		

## Summary of Processes and Controls

<p>conference (PAOC) held? (FAR 42.5, FAR 36.212 and FAR 36.522)</p> <p>(2) Was DD Form 1484, Post-award Conference Record, or similar locally developed form, used in conducting the conference? (DFARS 242.503-2)</p> <p>(3) Was a summary report of the conference prepared, signed, and distributed IAW FAR 42.503-1 and FAR 42.503-3?</p> <p>(4) Did the report cover all items discussed, including areas requiring resolution, controversial matters, the names of participants responsible for further actions, and the due dates for the actions? (FAR 42.503-3)</p> <p>(5) Were changes to the contract resulting from the Postaward conference finalized by a contract modification? (FAR 42.503-2)</p> <p>(6) If a letter was used in lieu of a PAOC, does the file contain a copy of the letter acknowledging receipt and understanding by the contractor? (FAR 42.504)</p> <p>d. Bonds and Insurance.</p> <p>(1) Are performance and payment bonds received from the contractor in the proper form and amount before issuance of a Notice to Proceed or start of work? (FAR 28.102-1)</p> <p>(2) Are surety bonds reviewed by counsel IAW AFARS 28.106-90?</p> <p>(3) Is the consent of surety obtained when the contract is modified to increase the contract price by more than 25% or \$50,000? Is the consent of surety obtained when a novation agreement is executed for contracts that require bonds? (FAR 28.106-5 and FAR 42.1204(f)(8))</p> <p>(4) Is a current insurance certificate in the file for the prime contractor IAW FAR 52.228-5?</p> <p>(5) Is insurance maintained at dollar levels required by the contract? (FAR 28.307-2)</p> <p>(6) Does the insurance certificate contain an endorsement that cancellation or any material changes in the policies require 30 days written notice to the contracting officer? (FAR 52.228-5)</p> <p>e. Modifications.</p> <p>(1) Is the appropriate authority for the modification (mod) cited in Block 13 of SF Form 30, Amendment Of</p>			
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## Summary of Processes and Controls

<p>Solicitation/Modification Of Con-tract?</p> <p>(2) For MODs resulting in contract price increases, are adequate funds certified available prior to the contracting officer's execution of the mod? (FAR 43.105(a))</p> <p>(3) Do MODs exceeding \$100,000 receive legal review IAW AFARS 1.602-2(c)?</p> <p>(4) Is field-pricing support requested prior to negotiating a mod resulting from a proposal in excess of \$500,000? (FAR 15.403-4)</p> <p>(5) Where technical or complicated issues are involved, is the contractor's proposal submitted to the requesting activity for review and comment? (FAR 15.305(a)(3))</p> <p>(6) Do supplemental agreements contain a release statement as required by FAR 43.204(c)?</p> <p>(7) Was the contingency statement removed by mod when funds were made available? (FAR 32.703-2(c)).</p> <p>(8) Was DD Form 350 accurately and timely prepared for every mod obligating/deobligating \$25,000 or more? (DFARS 204.670-2)</p> <p>(9) For MODs outside the scope of an existing contract:</p> <p>(a) Was a Justification &amp; Approval (J&amp;A) prepared if required? Was the J&amp;A certified and approved at appropriate levels? (FAR 6.303; FAR 6.304; FFARS 6.3)</p> <p>(b) Was mod action synopsized if required IAW FAR 5.201(b)(3)?</p> <p>(c) Was DD Form 2579, Small Business Coordination Record, prepared for all works over \$10,000? (DFARS 219.201)</p> <p>(10) Was a Pre-negotiation Objective Memorandum (POM) and Price Negotiation Memorandum (PNM) prepared as required? (FAR 15.808)</p> <p>(11) Did the contracting officer obtain clearance from the Office of Federal Contract Compliance Programs (OFCCP) prior to issuing a change order of at least \$1 million? (FAR 22.805)</p> <p>(12) For efforts designed by A-E firms, did the contracting officer determine if changes to construction contracts were due to an A-E design deficiency? (FAR 36.608 and FAR 36.609-2)</p> <p>(13) If the contract contains an assignment of claims, was it processed IAW FAR 32.805 and DFARS 232.805?</p> <p>f. Options.</p>			
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## Summary of Processes and Controls

<p>(1) Did the contracting officer issue a determination stating that exercising the option was in the best interest of the government and consider all appropriate factors IAW FAR 17.207(c)? Was legal review obtained IAW AFARS 1.602-2?</p> <p>(2) Were preliminary and final notices issued to the contractor indicating the intent of the government to exercise the option IAW option provisions of the contract?</p> <p>(3) Was an SF Form 98 requested for extension or exercise of option over \$2,500? (FAR 22.1007(b))</p> <p>(4) Did the contracting officer give notice to interested parties IAW FAR 22.1008-3(c) if incumbent contractor or subcontractor's service employees performing on the contract are represented by a collective bargaining agreement?</p> <p>(5) Was new Wage Determination incorporated into the contract for option period(s)? (FAR 22.1007(b))</p> <p>(6) Does the file show the List of Parties Excluded from Federal Procurement and Non-procurement Programs was checked prior to exercising option? (FAR 9.405)</p> <p>g. Sub-Contracts.</p> <p>(1) Did the contractor submit SF Form 1413, Statement and Acknowledgment, for identification of subcontractors IAW FAR 52.222-11(b)?</p> <p>(2) Did the contracting officer provide written consent to the subcontract IAW FAR 44.202-1 and FAR 52.244-1?</p> <p>(3) Does the file show screening of the Lists of Parties excluded from Federal Procurement or Non-procurement Programs for subcontractors? (FAR 44.202-2(a)(13))</p> <p>(4) Was certified cost or pricing data obtained when required prior to the contracting officer consenting to subcontracts? (FAR 15.804-2)</p> <p>(5) Does the file show that the contracting officer ensured subcontracts were placed IAW the prime contract clauses and provisions related thereto, including flow-down requirements?</p> <p>(6) Do contracts valued in excess of \$500,000 for supplies and services and \$1,000,000 for construction contain the clause at FAR 52.219-9, Small, Small Disadvantaged and Women-Owned Small Business Subcontracting Plan, or a determination by the contracting officer that there are no subcontracting opportunities?</p> <p>(7) In CPAF contracts, is the contractor's</p>			
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## Summary of Processes and Controls

<p>compliance/noncompliance with his subcontracting plan reflected in the award fee?</p> <p>h. Invoices and Payment.</p> <p>(1) Are requests for payment at least \$1,000 or 50 percent of the total contractor price? (FAR 52.232-1)</p> <p>(2) Are customers providing evidence of receipt/non-receipt of supplies/services to the DOC in a timely manner?</p> <p>(3) Is there evidence in the payment file that interest charges were incurred due to a breakdown in the acceptance and approval process?</p> <p>(4) Prior to approving initiation of progress payments, has the contracting officer determined that the contractor's accounting system and controls are adequate for proper administration of progress payments? (FAR 32.503-3)</p> <p>(5) Does the Contracting Officer verify percentages completed prior to certifying invoices for payment?</p> <p>(6) For construction contracts:</p> <p>(a) Did the contractor submit the certification at FAR 52.232-5(c) with each request for progress payment? (b) Do invoices or payment estimates contain the contracting officer's payment authorization IAW FAR 52.232-5(e)?</p> <p>(c) Was a release of claims statement received prior to final payment as required by FAR 52.232-5(g)?</p> <p>(7) For cost-reimbursement contracts:</p> <p>(a) Is the contractor required to submit invoices or vouchers in sufficient detail to allow the contracting officer to determine the allowability, reasonableness and allocability of costs claimed? (FAR 52.216-7; FAR 31.201-2, 31.201-3, 31.201-4.)</p> <p>(b) Did the contracting officer instruct the contractor to forward all vouchers to the auditor with a voucher copy to the contracting officer IAW AR 37-107?</p> <p>(c) Are contracts to which Cost Accounting Standards (CAS) apply assigned to Defense Contract Management Command (DCMC) for CAS administration only IAW FAR 30.601?</p> <p>(d) Are only items prescribed by the contract being claimed by the contractor for reimbursement? (FAR 16.301-1)</p> <p>(e) Has the contractor exceeded the cost ceiling in the contract without prior contracting officer approval? (FAR 16.301-</p>			
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## Summary of Processes and Controls

<p>1)</p> <p>(f) Is the contractor notifying the government when it is expected that costs will exceed 75% of the estimated contract amount during the next 60 days? (FAR 52.232-20)</p> <p>(g) Are other than small business concerns being paid no more than once every two weeks for amounts approved by the contracting officer? (FAR 52.216-7)</p> <p>(h) Has the contractor's accounting system been approved? Are changes in the contractor's cost accounting system being submitted to the contracting officer? (FAR 52.230-3)</p> <p>(8) For Time-and-Material and Labor-Hour Contracts:</p> <p>(a) Is the payment amount computed by multiplying the appropriate hourly rates by the number of direct labor hours performed? (FAR 52.232-7(a)(1))</p> <p>(b) Is the contractor's payment request substantiated by evidence of actual payment and by individual daily job timecards, or similar information? (FAR 52.232-7(a)(1))</p> <p>(c) Did the contracting officer withhold five percent of amount due until execution and delivery of a release by the contractor in accordance with FAR 52.232-7(f)?</p> <p>i. Labor Compliance.</p> <p>(1) Are payrolls submitted within 7 days after the regular payment date of the work covered by prime and subcontractors? (FAR 22.406-6 and FAR 52.222.8)</p> <p>(2) Are payrolls examined to ensure compliance with contract labor classifications and rates, fringe benefits, and hours worked? (FAR 22.406-6(c))</p> <p>(3) Are apprentices in an approved program and is the ratio of journeymen to apprentices satisfied? (FAR 52.222-9)</p> <p>(4) Are overtime premiums at government expense approved IAW FAR 22.103-4 and DFARS 222.103-4? If so, does the file document quarterly contracting officer reviews of overtime use to assure the continuing validity of the reasons justifying the need for overtime and to support the allowability of the overtime? Is overtime paid for hours over 40 per week at least 1-1/2 times the basic wage rate, IAW FAR 52.222-4?</p> <p>(5) Has a labor compliance check been made on-site by the contracting officer, administrator or COR? (FAR 22.406-7(b))</p> <p>(6) Was an SF 98 requested for changes affecting the scope</p>			
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## Summary of Processes and Controls

<p>of service contracts over \$2,500? (FAR 22.1007(b))</p> <p>j. Claims/Alternate Disputes Resolution (ADR).</p> <p>(1) Do claims over \$100,000 include the contractor certification required by the Contract Disputes Act? (FAR 33.207)</p> <p>(2) Was the contractor's claim processed IAW the "Disputes" clause (FAR 52.233-1) or an alternative method as prescribed at FAR 33.207?</p> <p>(3) Did the contracting officer obtain legal review of the proposed response to the contractor's claim? (AFARS 1.602-2)</p> <p>(4) Did the contracting officer issue a final decision within the statutory time limitations, IAW FAR 33.211(c)? Does the final decision contain information substantially IAW FAR 33.211(a)(4)(v)?</p> <p>(5) Was the final decision sent by certified mail, return receipt requested? (FAR 33.211(b))</p> <p>(6) Have ADR procedures been established for post-award disputes and claims?</p> <p>(7) Are after-action reports submitted to HQ FORSCOM within 20 days after completion or termination of ADR proceeding? (CIL 96-10 dated 20 Dec 95)</p> <p>(8) If the contracting officer rejects a request for ADR from a small business contractor, is the file documented with the reason for non-use IAW FAR 33.214(b)?</p> <p>k. Contract Completion.</p> <p>(1) Was final inspection and acceptance made by the government for construction contracts? (FAR 52.246-12)</p> <p>(2) Was a DD Form 1594, Contract Completion Statement, or local equivalent, used to close out completed contracts? Was the completed form signed by the contracting officer and made a part of the official contract file? (DFARS 204.804-1)</p> <p>(3) Did the COR or technical monitor (TM) provide all inspection records to the contracting officer upon completion of the contract?</p> <p>(4) Was a copy of the SF 1420, Performance Evaluation (Construction Contracts), sent to the Army Corps of Engineers for contracts greater than \$500,000 or defaulted over \$10,000? (FAR 36.201(a)(i) and (ii) and DFARS 236.201(c)(1)(a))</p>			
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## Summary of Processes and Controls

<p>l. Contractor Performance Evaluation.</p> <p>(1) Are evaluations of contractor performance prepared for all formal contracts, regardless of dollar amount, IAW FFARS 42.1502-90(a)?</p> <p>(2) Are evaluations of contractor performance for service and information technology contracts in excess of \$1 million, and for fuel or health contracts in excess of \$100,000 entered in the Army Past Performance Information System (PPIMS), in accordance FAR 42.1502 and AFARS 42.1502-90?</p> <p>(3) Are evaluation reports completed and provided to the contractor for review within 60 days after the end of the rating period? (AFARS 42.1504-90(b))</p> <p>(4) Was a copy of the report furnished to the contractor requesting contractor comments within 30 calendar days of receipt? (AFARS 42.1504-90(b))</p> <p>(5) Are contractor rebuttals or comments made a part of the performance evaluation reports IAW AFARS 42.1504-90(d)?</p> <p>(6) Are performance evaluation reports for construction and architect-engineer contracts prepared IAW FAR 36.201 and FAR 36.604, respectively? (FAR 42.1502(b))</p> <p>(7) Are appropriate measures in place to protect access to evaluation information? Are evaluation documents marked "For Official Use Only" IAW AFARS 42.1503-90(f)(4)?</p> <p>m. Quality Assurance Surveillance. Are QA Programs enforced to ensure supplies and services acquired conform to contract quality and quantity requirements (FAR 46.102).</p> <p>n. Appointment, Review, and Training of Contracting Officer Representatives (CORS).</p> <p>(1) Are CORs appointed in writing IAW AFARS 1.602-2-90? Are CORs qualified by training and experience commensurate with the responsibilities (DFARS 201.602-2) and are they appointed and terminated in writing IAW AFARS 1.602-2-90?</p> <p>(2) Did the contracting officer furnish to the contractor the names, duties, responsibilities and limitations of the COR? Did notification require a signed acknowledgment of receipt? (AFARS 1.602-2-90) Did both the COR and the contractor</p>			
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## Summary of Processes and Controls

<p>acknowledge receipt of the designation letter by signing and returning a copy to the contracting officer (AFARS 1.602-2-90)?</p> <p>(3) Are terminations of COR appointments issued in writing IAW AFARS 1.602-2-90? See (1) above.</p> <p>(4) Does the COR have a copy of the contractor's quality control (QC) plan and contractor staff roster with their duties and responsibilities?</p> <p>(5) Has the COR received formal COR training? Does the contracting officer provide adequate supplemental or follow-up training to the COR tailored to the assigned contract(s)? (FFARS Appendix BBB, BBB-201(d))</p> <p>(6) Is there a sufficient number of properly trained personnel to perform adequate contract surveillance and other postaward contract administration (AFARS BB.201) and to perform inspection and acceptance functions?</p> <p>o. Surveillance Plans.</p> <p>(1) Has a quality assurance surveillance plan (QASP) been prepared for the contract IAW DFARS 246.102, FFARS 46.201 and Appendix BBB-200?</p> <p>(2) Did the contracting officer approve the QC plan/program IAW terms of the contract?</p> <p>(3) Did the contractor revise the QC plan/program when changes were affected?</p> <p>(4) Did the COR monitor contractor performance in accordance with the QASP to ensure contract compliance?</p> <p>(5) Are on-site inspections performed in sufficient frequency and duration to protect government's interests?</p> <p>(6) Did the COR and/or other functional personnel review the QASP prior to inclusion in the solicitation and assist the contracting officer in the approval of the QC Plan? Was the review documented?</p> <p>(7) Does the COR/TM review contractor performance and recommend increase or decrease surveillance activity based upon analysis of contractor performance?</p> <p>r. Progress and Performance Reports (Construction).</p> <p>(1) Has the contractor submitted a contract progress schedule IAW contract provisions?</p>			
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## Summary of Processes and Controls

<p>(2) Are revised progress schedules obtained when performance periods are extended 60 or more days?</p> <p>(3) Do elements of work accurately reflect the percentage of contractor effort to do the job?</p> <p>(4) Did the contractor start work within the time frame specified in the contract or as authorized by the contracting officer?</p> <p>(5) Did all maintenance and repair work commence prior to 1 Jan of the next year on all contracts/delivery orders/calls issued at fiscal year end?</p> <p>(6) For construction contracts, was the contractor advised in writing that an unsatisfactory performance evaluation report (SF Form 1420) was being prepared? (FAR 36.201(a)(3))</p> <p>q. Quality Deficiency Reports.</p> <p>(1) Are COR contract discrepancy reports (CDRs) or quality deficiency reports (QDRs) prepared as required? Are they supported by schedule inspection sheets, Surveillance Activity Checklist and Tally Checklists?</p> <p>(2) Does the contracting officer act upon adverse COR reports (including CDRs/QDRs)? Is the action taken timely to alleviate or resolve discrepancies? Are deductions taken or consideration received for all improper, poor or failed performance?</p> <p>r. Quality Assurance Files and Documentation.</p> <p>(1) Is the QASP maintained in the contract file?</p> <p>(2) Are COR/QAS inspections scheduled on COR/QAS Surveillance Schedule? Marked "FOUO"? Are inspections documented?</p> <p>(3) Did the COR document the results of the review/inspection of the contractor's QC plan/program?</p> <p>(4) Is the file documented to show how the contractor is performing and provide data necessary for improvements or incentives for contractors .</p> <p>(5) Do surveillance results have the potential to support corrective action taken by the COR when nonperformance or unsatisfactory performance occur?</p> <p>s. Delivery Orders (Indefinite Delivery Contracts).</p>			
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## Summary of Processes and Controls

<p>(1) Are delivery orders/task orders issued IAW contract terms? Do delivery orders/task orders item numbers match numbers on the contract schedule?</p> <p>(2) Do files contain a copy of each delivery order/task order issued? (FAR 4.803(b))</p> <p>(3) Do files contain a cumulative record of delivery orders/task orders issued so that the total estimated value of each year is issued so that the total estimated value of each year is available for review?</p> <p>(4) Were delivery order/task order modification numbers IWAS DFARS 204.7004(d)?</p> <p>(5) Are contract ordering officers used only for the purposes set forth at AFARS 1.602-2-91?</p> <p>(6) Are task order contracts being issued solely for services?</p> <p>(7) Under multiple award IDIQ contracts are awardees being provided a fair opportunity to be considered for each order in excess of \$2,500?</p> <p>(8) Is the requirement within the scope outlined in the contract? Does the order clearly describe all services to be performed or supplies to be delivered? Is the work to be done within the period defined in the contract? Within the maximum value stated in the contract? Is the order barred by any other limitation in the contract or the FAR?</p> <p>(9) Are the files documented demonstrating price reasonableness?</p> <p>t. Cost Plus Award Fee Contracts.</p> <p>(1) Has an Award Fee Plan (AFP) been established for conducting evaluations and determining award fee at stated intervals? (FAR 16.405-2(b))</p> <p>(2) Has a board been established to evaluate the contractor's performance and determine the amount of award fee? (DFARS 216.405-2(b))</p> <p>(3) Has the basis of all award fee determinations been documented in the contract file? (DFARS 216.405-2(a)(ii))</p> <p>u. Government Property.</p> <p>(1) Has a property administrator (PA) been assigned for every contract involving government-furnished property (GFP)? (FFARS 45.104(a))</p>			
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## Summary of Processes and Controls

<p>(2) Does the PA maintain a listing of all assigned active and completed contracts? Does the PA maintain a contract file or have ready access to all contracts that are assigned for administration, IAW FORSCOM Pamphlet (Pam) 715-6?</p> <p>(3) Has the PA established a Contract Property Control Data File and a Property Summary Data Record for each assigned contract? Does the file contain the minimum data required by FORSCOM Pam 715-6?</p> <p>(4) Have all contractors with new contracts been required to submit a written property control system plan? Was the plan staffed with the appropriate functional directorates, and their comments considered prior to approving or disapproving the system? (FORSCOM Pam 715-6)</p> <p>(5) Did the PA advise the contractor in writing that the property control system was approved, subject to subsequent reviews of the procedures in actual practice? (FORSCOM Pam 715-6)</p> <p>(6) Is the contractor required to update or revise the property control system when surveillance indicates weak or nonexistent controls? (FORSCOM Pam 715-6; FAR 45.502)</p> <p>(7) Do the contractor's procedures cover property at secondary locations of the prime contractor, or at subcontractor locations? (FORSCOM Pam 715-6)</p> <p>(8) Did the PA participate in the last contractor physical inventory to verify that the approved procedures were actually used, and spot checking contractor inventory counts? Did the contractor provide the results of physical inventories to the PA, in the prescribed manner? (FAR 45.508-2)</p> <p>(9) Has the PA reviewed the contractor's actual usage of government-furnished materials, and taken appropriate action when reviews indicate excessive or unusual consumption?</p> <p>(10) Has the PA discussed DD Form 1662, DOD Property in the Custody of Contractors, with the contractor and provided necessary assistance for its completion? (FAR/AFARS 45.505-14; DFARS 245.505-14; FORSCOM Pam 715-6)</p> <p>(11) Property Control System Surveillance.</p> <p>(a) Has the PA established a schedule for conducting a complete system survey for each assigned contract, and is the survey being performed as scheduled? (FORSCOM Pam 715-6)</p> <p>(b) Upon completion of each category or functional area</p>			
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## Summary of Processes and Controls

<p>survey, are the critical findings and recommendations provided to the contractor in writing, to include correction target dates? Are follow-up surveys scheduled and conducted in those areas found to be deficient, NLT 30 days following the initial finding? (FORSCOM Pam 715-6)</p> <p>(c) Was the effectiveness of the prime contractor's control over GFP located at secondary sites or at subcontractor locations evaluated in the system survey? (FORSCOM Pam 715-6)</p> <p>(12) Contractor Liability for GFP.</p> <p>(a) Does the PA require the contractor to report all loss, damage or destruction of GFP as soon as the facts become known to the contractor? (FORSCOM Pam 715-6)</p> <p>(b) Does the PA maintain a system which identifies all loss, damage or destruction of property and which reflects the status of the PA's assessment of the contractor's liability? Does the PA initiate an immediate investigation of each case of loss, damage or destruction of property? (FORSCOM Pam 715-6)</p> <p>(c) Does the system require referral of liability assessments to the contracting officer for determination of contractor liability? (FORSCOM Pam 715-6)</p> <p>v. Termination Actions.</p> <p>(1) For contracts terminated for default, were Show Cause/Cure Notices issued IAW FAR 49.607, with copy to SBA when small business is involved IAW FAR 49.402-3?</p> <p>(2) Was the surety promptly notified of any failure by the contractor to perform? (FAR 49.402-3(h))</p> <p>(3) Prior to terminating a contract with outstanding guaranteed loans, progress or advance payments, or small business with Certificate of Competency (COC) or small business loan, was Head of Contracting Activity (HCA) approval obtained IAW AFARS 49.402-3?</p> <p>(4) Was a notice of termination issued to the contractor IAW FAR 49.102?</p> <p>(5) Was a no-cost settlement agreement executed if conditions at FAR 49.109-4 existed?</p> <p>(6) If the settlement proposal totals \$100,000 or more, was it referred to the appropriate audit agency for review and recommendations IAW FAR 49.107(a)?</p> <p>(7) If subcontract settlements received for approval</p>			
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## Summary of Processes and Controls

<p>exceeded \$100,000, were they referred to the appropriate audit agency for review and recommendations IAW FAR 49.107(b)?</p> <p>(8) Was a settlement memorandum and PNM prepared at the conclusion of settlement? (FAR 49.110)</p> <p>(9) Was the settlement agreement executed on Standard Form 30 IAW FAR 49.109 and FAR 49.602-5?</p> <p>(10) Did the proposal by the surety concerning completion of the work receive careful consideration by the contracting officer? (FAR 49.404(b))</p> <p>(11) Did the contracting officer arrange for completion of the work by awarding a new contract based on the same plans and specifications, exercising reasonable diligence to obtain the lowest price available for completion? (FAR 49.405)</p> <p>(12) Were other courses of action considered in lieu of termination for default when in the government's interest? (FAR 49.402-4)</p> <p>(13) Did the contracting officer prepare the memorandum required by FAR 49.402-5 explaining the reasons for the action taken when a contract was terminated for default?</p> <p>(14) Did the contracting officer make written demand for excess re-procurement cost from the defaulted firm upon repurchase? (FAR 49.402-6)</p> <p>(15) If the government is entitled to liquidated damages under the terms of the defaulted contract, did the contracting officer promptly ascertain and make demand for any such damages? (FAR 49.402-7)</p> <p>w. Contract Administration Plans</p> <p>(1) Has a contract administration plan (CAP) been prepared for every contract in excess of \$100,000? (FFARS 42.301)</p> <p>(2) Is the CAP tailored to the contract, in accordance with FFARS Appendix BBB-101</p> <p>(3) Has a formal CAP been prepared for all contracts identified at FFARS App BBB-101 (d)(3)?</p> <p>(4) Are formal CAPs forwarded for review along with the solicitation IAW FFARS 1.602-1-90(S-103)?</p>			
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**Category/Topic: Acquisition/ Commercial Items**

## Summary of Processes and Controls

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Market Research</p> <p>(1) Was the description of the government's needs stated in terms sufficient to allow the conduct of market research? (FAR 10.002(a))</p> <p>(2) Was market research conducted to determine if commercial items or non-developmental items were available to meet the governments needs or could be modified to meet the government's needs? (FAR 10.002)</p> <p>(3) Did market research identify the customary business practices relating to the item/service being procured? (FAR 10.002)</p> <p>(4) Were the results of market research used for the appropriate determinations in accordance with FAR 10.001(a)(3)? Does the file contain documentation of the market research?</p> <p>(5) Did market research cover the information at FAR 10.002 and any other information specific to the item being acquired? (FAR 10.002(b)(1))</p> <p>(6) If market research established that a type of item available in the commercial marketplace could meet the government's needs, were the policies and procedures at FAR Part 12 used? (FAR 10.002(d)(1))</p> <p>(7) Were the results of the market research documented in a manner appropriate to the size and complexity of the acquisition? (FAR 10.002(e))</p> <p>(8) If market research established that the government's needs could not be met by a type of item or service available in the commercial marketplace and publication of the notice at FAR 5.201 is required, did the contracting officer include the notice to prospective offerors that the government does not intend to use Part 12 for the acquisition? (FAR 10.002(d)(2))</p> <p>(9) If it is determined that an item or service available in the commercial marketplace can satisfy the government's needs, did the contracting officer use FAR Part 12 for the acquisition? (FAR 12.102(a))</p> <p>b. Did the contracting officer use the SF 1449 when issuing</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole.</i></p>		

## Summary of Processes and Controls

<p>written solicitations and awarding contracts for commercial items expected to exceed the simplified acquisition threshold? (FAR 12.204)</p> <p>c. Where technical information is necessary for evaluation of offers was existing product literature used in lieu of unique technical proposals? (FAR 12.205)</p> <p>d. Were offerors allowed to propose more than one product in response to solicitations for commercial items? Was each product evaluated as a separate offer? (FAR 12.205(b))</p> <p>e. Was past performance (from a wide variety of sources both inside and outside the government) considered in the evaluation and award? (FAR 12.206)</p> <p>f. Was either a firm-fixed-price or fixed-price with economic price adjustment contract used to acquire commercial items? (FAR 12.207)</p> <p>g. Was the contractor's existing quality assurance system relied on as a substitute for government inspection and testing before tendering items for acceptance? (FAR 12.208)</p> <p>h. Were the policies and procedures in Part 15 used to establish reasonableness of price? (FAR 12.209)</p> <p>i. Where the contract required the delivery of technical data, were the appropriate provisions and clauses delineating the rights in technical data included as an addenda to the solicitation and contract? (FAR 12.211)</p> <p>j. Were the following provisions and clauses included in the solicitation and resultant contract IAW FAR 12.301(a) and (b)?</p> <ul style="list-style-type: none"> <li>(a) 52.212-1, Instructions to Offerors-Commercial Items</li> <li>(b) 52.212-3, Offeror Representations and Certifications-Commercial Items</li> <li>(c) 52.212-4, Contract Terms and Conditions-Commercial Items</li> <li>(d) 52.212-5, Contract Terms and Conditions Required to</li> </ul>			
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## Summary of Processes and Controls

<p>Implement Statutes or Executive Orders-Commercial Items</p> <p>k. When use of evaluation factors was appropriate did the contracting officer include the provision at 52.212-2, Evaluation-Commercial Items or a similar provision containing all evaluation factors required by 13.106-1, Subpart 14.2 or 15.6 as an addendum? (FAR 12.301(c))</p> <p>l. Were other FAR provisions and clauses used consistent with the limitations contained in FAR 12.301(e)?</p> <p style="padding-left: 20px;">(a) The FAR 16.505 clauses included when an indefinite-delivery type contract is contemplated?</p> <p style="padding-left: 20px;">(b) Provisions and clauses prescribed in FAR 17.208 or paragraph (b) of 52.212-2 included when the use of options is in the government's interest?</p> <p style="padding-left: 20px;">(c) Provisions and clauses contained in Part 23 included when the use of recovered material may be appropriate?</p> <p>m. Were the appropriate DFARS clauses used as prescribed? (DFARS 212.301)</p> <p>n. Tailoring of Clauses</p> <p style="padding-left: 20px;">(a) Was the provision at 52.212-1, Instructions to Offerors - Commercial Items, and the clause at 52.212-4, Contract Terms and Conditions - Commercial Items tailored IAW results of market research? Was tailoring to adapt the acquisition to the market conditions within limitations of FAR 12.302(a)?</p> <p style="padding-left: 20px;">(b) Were the following paragraphs of the clause at 52.212-4, Contract Terms and Conditions not tailored IAW FAR 12.302(b): Assignments; Disputes; Payment; Invoice; Other Compliance's; and Compliance with laws unique to government contracts?</p> <p style="padding-left: 20px;">(c) Was a waiver approved by the HCA IAW FAR 12.302(c) and DFARS 212.302(c) to include tailored clauses or additional terms and conditions in a solicitation or contract that were inconsistent with customary commercial practices for the item being acquired?</p> <p style="padding-left: 20px;">(d) Was tailoring accomplished by addenda to the solicitation/contract IAW FAR 12.302(d)?</p> <p style="padding-left: 20px;">(e) Does block 27(a) of the SF 1449 indicate if addenda are</p>			
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## Summary of Processes and Controls

<p>attached IAW FAR 12.302(d)?</p> <p>o. To the maximum extent practicable, were solicitations and contracts assembled using the format at FAR 12.303?</p> <p>p. Was the acceptance paragraph in FAR 52.212-4 generally used when acquiring noncomplex commercial items? (FAR 12.402(a))</p> <p>q. Were other acceptance procedures used as appropriate for complex commercial items? Were commercial items used in critical applications included as an addendum to ensure adequate protection of the government's interest? (FAR 12.402(b))</p> <p>r. Termination</p> <p style="padding-left: 20px;">(a) Were the procedures at FAR 12.403 used when terminating contracts?</p> <p style="padding-left: 20px;">(b) Was legal counsel consulted prior to terminating for cause IAW FAR 12.403(b)?</p> <p style="padding-left: 20px;">(c) Was a cure notice sent to the contractor prior to terminating a contract other than for late delivery? (FAR 12.403(c))</p> <p style="padding-left: 20px;">(d) When a termination for cause was used, did the contracting officer send the contractor written notification to comply with FAR 12.403(c)(3)?</p> <p style="padding-left: 20px;">(e) Were the procedures at FAR 12.403(d) used when terminating for the government's convenience?</p> <p>s. Were offers evaluated IAW evaluation factors contained in the solicitation? (FAR 12.602)</p> <p>t. If appropriate, was a combined synopsis/solicitation used to reduce the time required to solicit and award the contract IAW FAR 12.603? Did the established response time allow a reasonable opportunity for the prospective offeror to respond?</p>			
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## Summary of Processes and Controls NAF

This exhibit contains guidelines specific to the self-assessment of a Non-Appropriated Fund (NAF) contracting activity, though review of NAF actions may require sections of Exhibit A as well. The enclosed charts are intended to serve as a guide and may be included as an attachment to the self-assessment. The charts are divided into topics. The first column sets forth intended objectives, in the form of checklist type questions. As a starting point, the objectives provided closely mirror those items found in Chapter 3 of the previous CMR Pamphlet. DOCs may tailor the objectives as needed to reflect the mission of the organization. In the next column, the DOC must explain the internal process controls that are used to ensure successful completion of the objectives under that topic. The purpose of this exhibit is not to specifically answer each question, but rather describe the method of oversight for ensuring that the tasks are accomplished. The last two columns display the type of control and control rating, as categorized below.

### **TYPES OF CONTROLS:**

**Documentation (D):** Written descriptions of process goals and operational procedures.

**Records (R):** Files maintained to provide an audit trail.

**Authorization (A):** Procedures in place to establish authority levels and prevent personnel from exceeding their authority.

**Structure (ST):** The overall framework for work performance which delineates the separation of key duties among individuals within the work setting.

**Supervision (SU):** The assignment, review and approval of work within the control environment to reduce losses and improve achievement of results.

**Security (SC):** Systems within the control environment that assign accountability, limit access and safeguard resources.

### **CONTROL RATING – Subjectively evaluates the effectiveness of the control:**

**Strong (S)**

**Adequate (A)**

**Weak (W)**

## Summary of Processes and Controls NAF

**Topic: General**

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Are APF contracting officers using the policies, procedures, and guidance in AR 215-4, NAF Contracting, and AR 215-1, Morale, Welfare, and Recreation (MWR) Activities and Nonappropriated Fund Instrumentalities (NAFI), dated 25 Oct 98? (AR 215-4, 1-7a and AR 215-1, 7-34)</p> <p>b. Did the garrison commander or designee approve NAF purchase requests, except those for resale merchandise, estimated to exceed \$25,000? (AR 215-4, 1-12). Budget approval of acquisition requirements constitutes authorization for those requirements. (AR 215-1, 12-6)</p> <p>c. Was action taken on NAF purchase requests within ten calendar days after receipt in the DOC? (AR 215-4, 3-14)</p> <p>d. When applicable, are separate procurement registers/logs established and maintained by APF contracting officers for each of the NAF procurement instruments used? (AR 215-4, 2-1)</p> <p>e. Were NAF forms used when accomplishing NAF acquisitions? (AR 215-4, 2-15)</p> <p>f. When APFs are to be expended for a MWR acquisition, the provisions of the Federal Acquisition Regulation (FAR), FAR supplements, and AR 215-1 apply. (AR 215-1, 7-34)</p> <p>g. Were NAF requirements awarded to government personnel or other NAF personnel only when there was a compelling reason and the award was approved by the garrison commander? (AR 215-4, 4-3 and AR 215-1, 4-12n(1))</p> <p>h. Did NAF acquisitions receive the same immunity from state and local taxation as the APF acquisition? (AR 215-4, 1-23 and AR 215-1, 3-1b(2))</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

<p>i. Are competitive negotiations used to the maximum extent practicable when accomplishing NAF acquisitions? (AR 215-4, 1-10 and DODI 4105.67)</p> <p>j. Are sealed bidding procedures used only when the conditions at AR 215-4, 4-43 exist or when it can be documented as being more advantageous to the NAFI? (DODI 4105.67)</p> <p>k. Were mistakes before award handled IAW AR 215-4, 4-41?</p> <p>l. Were Sealed bids accomplished in accordance with AR 215-4, Section IV?</p> <p>m. Did requirements for consolidated contracts and agreements contain MACOM approval prior to solicitation? (CIL #00-1)</p> <p>n. Were recycling contracts awarded in accordance with AR 215-1, 12-15?</p> <p>o. Commanders may use APF contracts for organizational memberships in and use of local commercial or municipal fitness facilities when military facilities are not available or adequate. (AR 215-1, 8-14b(2)(a))</p> <p>p. Did the request for membership in a local commercial or municipal fitness facility contain a copy of the Commander's written assessment that addressed commuting distance and lack of free opportunity in the local community where assigned? (AR 215-1, 8-14b(2)(a)1.)</p> <p>q. Did APF contracting officers build their NAF procurement instrument identification numbers (PIINs) using the codes located in AR 215-1, Appendix F, Table F-1 as the fourth and fifth positions in the PIIN? (AR 215-4, 2-1 and CIL 86-5)</p> <p>r. Did APF contracting officers build their NAF procurement PIINs using the number "2" in the sixth position? (AR 215-4, 2-1)</p>			
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## Summary of Processes and Controls NAF

### Topic: Applicable Laws and Regulations

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Was DA Form 4074-R (Contract Clauses – NAF Supply and Services Contracts) attached to applicable NAF acquisitions? (AR 215-4, 2-14a)</p> <p>b. Was DA Form 4075-R (Contract Clauses – NAF Construction) attached to applicable NAF Acquisitions? (AR 215-4, 2-14b)</p> <p>c. When applicable, is the Buy American Act applied to NAF acquisitions for use in the continental United States? (AR 215-4, 1-17)</p> <p>d. When applicable, were provisions of the Walsh-Healey Public Contracts Act (41 USC 35-45) applied to NAF acquisitions? (AR 215-4, 1-18)</p> <p>e. When applicable, was the Davis-Bacon Act (40 USC 276a) applied to NAF construction acquisitions? (AR 215-4, 1-19)</p> <p>f. When applicable, was the Copeland Act (Anti-Kickback, 18 USC 874 and 40 USC 276a) applied to NAF construction acquisitions? (AR 215-4, 1-20)</p> <p>g. When applicable, was the Trade Agreements Act (PL 96-39) applied to NAF acquisitions? (AR 215-4, 1-22)</p> <p>h. When applicable, were NAF requirements obtained from the Federal Prison Industries, Inc., from the Blind, and the National Industries of the Severely Handicapped? (AR 215-4, 4-2)</p> <p>i. When applicable, was the option clause justified and placed in Service Contracts? (AR 215-4, 7-3b)</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

**Topic: ADPE**

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Does acquisition of MWR data processing systems and equipment, including hardware and software, excluding office automation, for use within MWR activities meet the MWR standard established by the MISSC? (AR 215-1, 7-31c)</p> <p>b. Office automation software must meet installation-specific requirements, regardless of funding source. (AR 215-1, 7-31c)</p> <p>c. Procedures outlined in AR 70-1, Army Acquisition Policy, are used for APF-funded NAFI data processing systems and equipment requirements. (AR 215-1, 7-31c(2))</p> <p>d. Procedures outlined in AR 215-4 are used for NAF-funded NAFI data processing systems and equipment requirements. (AR 215-1, 7-31c(2))</p> <p>e. Garrison commanders will approve all NAF purchase requests for stand-alone systems that are not part of the MSR MIS standard systems up to \$50,000. (AR 215-1, 7-31d(1))</p> <p>f. MACOM commanders will approve all NAF purchase requests for stand-alone systems that are not part of the MWR MIS standard systems exceeding \$50,000 and integrated systems, regardless of use. (AR 215-1, 7-31d(2))</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

### Topic: Commercial Sponsorship

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>Are NAF contract specialists aware of and complying with the following?</p> <p>a. APF officials responsible for procurement or contracting will not be directly or indirectly involved with the solicitation of commercial sponsors but may advise on whether vendors are barred from doing business with the Government. (AR 215-1, 7-47d(3))</p> <p>b. NAF contracting officials may act in an advisory capacity in developing SOPs, however, they have no approval authority. (AR 215-1, 7-47d)</p> <p>c. NAF contracting officials may obligate funds IAW AR 215-4 in support of the commercial sponsorship program. (AR 215-1, 7-47d(3))</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		



## Summary of Processes and Controls NAF

### Topic: Amusement/Vending Machines

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Were the provisions and applicability of AR 210-25, Vending Facility Program for the Blind on Federal Property, reviewed before entering into or renewing contracts for, or direct operation of any vending machine and snack, cafeteria, or other food operation? (AR 215-1, 7-2c(8))</p> <p>b. Do management controls for amusement and vending machine operations focus on control of access to the machines/cash boxes and cash collection procedures? (AR 215-1, 8-2b)</p> <p>c. Do vending/amusement machine contracts, using fee per machine payment method, require impartial observers when cash boxes or merchandise cabinets are emptied or serviced? (AR 215-1, 8-2b)</p> <p>d. Do vending/amusement machine contracts state that keys are controlled to restrict access to cash boxes and internal control devices? (AR 215-1, 8-2d(1))</p> <p>e. Do vending/amusement machine contracts state that keys will remain in the custody of the DCA (or equivalent) or installation key control officer appointed in writing? (AR 215-1, 8-2d(2))</p> <p>f. Does the vending/amusement machine contract address sales accountability? (AR 215-1, 8-2e)</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

### Topic: Commercial Entertainment

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Do commercial entertainment contracts state that the producer is responsible for obtaining all copyright clearances and paying all royalty, rents, and related fees unless otherwise specified? (AR 215-1, 8-11b(5)(c))</p> <p>b. Do commercial entertainment contracts state that copies of all copyright clearances or licenses shall be forwarded to USACFSC, ATTN: CFSC-SF-F, no later than 6 weeks prior to the scheduled performance? (AR 215-1, 8-11b(5)(c))</p> <p>c. Commercial/professional entertainers are procured without competition. (AR 215-1, 8-12)</p> <p>d. The Director of Community and Family Activities (DCA) or equivalent may approve commercial entertainment contracts in amounts not to exceed \$25,000. (AR 215-1, 8-12a(2))</p> <p>e. The garrison commander or designee will approve commercial entertainment contracts in amounts, which exceed \$25,000. (AR 215-1, 8-12a(2))</p> <p>f. When required by State or local laws, contract are negotiated only with licensed agents. (AR 215-1, 8-12a(4))</p> <p>g. Did solicitations inform prospective entertainers that an auditioned may be required by the activity manager at no cost to the Fund? (AR 215-1, 8-12b(2))</p> <p>h. Did contracts for commercial entertainers contain completed evaluations of each act? (AR 215-1, 8-12b(3))</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

### Topic: Golf Professionals

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. When supported by a cost benefit analysis, installations may contract for the services of a golf professional under the provisions of AR 215-4. (AR 215-1, 8-13c(3)(a))</p> <p>b. A contract with a golf professional may allow the golf professional to share in earnings for the sale of merchandise, golf cars and equipment rentals, and golf lessons. (AR 215-1, 8-13c(3)(a))</p> <p>c. Did the golf professional contract require the golf professional to maintain separate records of the number of rounds played by reciprocal patrons for market analysis, assessment of fees and charges and budget preparation? (AR 215-1, 8-13d(4))</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

**Topic: Alcoholic Beverages**

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Malt beverages and wine purchased with NAFs for resale or other use are purchased from in-State sources, while distilled spirits may be purchased from any source. (AR 215-1, 7-12b)</p> <p>b. A NAFI may contract for special label or special brand alcoholic beverages only when approved by the MACOM. (AR 215-1, 7-12d)</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

### Topic: Food, Beverage & Entertainment

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Installations may contract for MWR food services only with MACOM and USA Community and Family Support Center (CFSC) approval. (AR 215-1, 7-2c(8))</p> <p>b. Installations may contract with the Installation Morale, Welfare, and Recreation Funds (IMWRF) for clubs to provide troop feeding service for emergency situations when troops dining facilities are not available, consistent with provisions of AR 30-1, The Army Food Service Program, and the FAR. (AR 215-1, 8-17b(2)(d))</p> <p>c. Appropriated funds (APFs) may be used to contract with IMWRF for use of food, beverage, and entertainment (FB&amp;E) programs if sole source is fully justified or as otherwise provided for in the FAR. (AR 215-1, 8-17e(2))</p> <p>d. Were vendors for private sector sales promotions in FB&amp;E programs obtained in accordance with AR 215-1, 8-17e(7)?</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

### Topic: Firearms

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. A NAFI that directly purchases firearms and ammunition from a manufacturer or importer located in the United States is not subject to Federal taxes. (AR 215-1, 8-18b(23)(b))</p> <p>b. Activities located in the United States, its possessions, and Puerto Rico that import firearms or ammunition directly from a foreign dealer or manufacturer are subject to a Federal firearms tax of 10 percent on pistols and revolvers and 11 percent on all other firearms and all ammunition in accordance with Federal law 26 USC 4181. (AR 215-1, 8-18b(23)(b))</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

### Topic: Sports Officiating

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Athletic officiating services are funded by APFs only under an APF contract or purchase order. (AR 215-1, 8-21b(3)(a))</p> <p>b. A NAFI may be awarded a sports officiating contract only on a sole source basis and the contract must be awarded IAW FAR procedures. (AR 215-1, 8-21b(3)(a))</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

### Topic: Youth Activities

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Were contract instructors for youth programs screened in accordance with AR 215-3, AR 608-10 and the latest USACFSC guidance? (AR 215-1, 8-24b(9)(b))</p> <p>b. Did solicitations for youth program instructors contain language addressing a local pre-employment background check and line of sight supervision? (AR 215-1, 8-24b(9)(c))</p> <p>c. Did solicitations for youth program instructors state that permanent employment is contingent on favorable Criminal Investigation Division, National Agency Check or National Agency Check with Written Inquiries, and State Criminal History Repository inquiries? (AR 215-12, 8-24b(9)(c) and CIL #98-3)</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		



## Summary of Processes and Controls NAF

### Topic: Construction Contracts

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. In accordance with FORSCOM contracting information letter (CIL) #93-1, APF contracting officers may not solicit nor award NAF Architect and Engineering requirements.</p> <p>b. Maintenance, repair, and construction requirements are coordinated with the installation Director of Public Works. (AR 215-1, 10-4a)</p> <p>c. Was the planned MWR facilities included in the installation master plan? (AR 215-1, 10-4a)</p> <p>d. Did the dual-funded construction requirement, up to \$300,000, contain the written approval of the MACOM Commander? (AR 215-1, 10-4c(3))</p> <p>e. Did the dual-funded construction requirement, with cost between \$300,000 and \$1.5 million, contain the written approval of the Facilities and Housing Directorate (DAIM-FDR, OAC-SIM)? (AR 215-1, 10-4c(3))</p> <p>f. Did the dual-funded construction requirement, for cost that exceeds \$1.5 million, contain the written approval of the Office of the Deputy Assistant Secretary of the Army (Installations and Housing)? (AR 215-1, 10-4c(3))</p> <p>g. Were Capital Purchases and Minor Construction (CPMC) projects below \$500,000 approved by the MACOM? (AR 215-1, 10-7a(1))</p> <p>h. Were additions, deletions, deferments, or modifications on approved CPMC contracts reported to the requesting activity for final reporting to USACFSC? (AR 215-1, 10-7a(2))</p> <p>i. Was Congressional approval received, prior to award, on</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

**Summary of Processes and Controls**  
**NAF**

<p>NAF Major Construction (NAFMC) projects that exceed \$500,000? (AR 215-1, 10-7b(1))</p> <p>j. Approval authority for NAF maintenance and repair projects is located in AR 420-10.</p>			
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## Summary of Processes and Controls NAF

### Topic: Audit Contracts

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. When contracting with a CPA firm, the Auditor General must approve the solicitation before its release and contract award. (AR 215-1, 13-2c)</p> <p>b. Contracts will include a provision to allow technical review by US Army Audit Agency (USAAA) when deemed necessary. (AR 215-1, 13-2c)</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

### Topic: Administration

Assessment of Objectives	Internal Process Control	Type of Control	Control Rating
<p>a. Were NAF contracts administered in accordance with AR 215-4, Chapter 7?</p> <p>b. Were NAF acquisitions closed out in accordance with AR 215-4, Chapter 7, Section V?</p> <p>c. Is DA For 4073-R used to modify or amend an acquisition? (AR 215-4, 4-26a)</p> <p>d. Are Cure Notices sent IAW AR 215-4, 7-26?</p> <p>e. Are Change Orders issued IAW AR 215-4, 7-5?</p> <p>f. Are Constructive Changes issued IAW AR 215-4, 7-6?</p> <p>g. Did the contracting officer provide written notice to the contractor of the decision to exercise the option clause? (AR 215-4, 7-3)</p> <p>h. Did the contracting officer make a determination to exercise the option based on price, failure to produce a better price or a more advantageous offer, informal analysis of current market prices and other factors? (AR 215-4, 7-3f(2))</p> <p>i. If the decision was made to reject items contracted for, did the contracting officer notify, in writing, the contractor of the reason for the rejection and give him the opportunity to correct the problem, if corrections could be made within the required delivery schedule? (AR 215-4, 5-66b)</p> <p>j. Is the contract file documented to reflect that a rejection occurred, the basis on which the items were rejected, and the corrective action taken? (AR 215-4, 5-67b)</p>	<p><i>The purpose of this column is not to answer each question, but rather to describe the DOCs processes and controls for successfully responding to the objectives. The internal process controls may be described at a level that addresses the topic as a whole, or appropriately grouped objectives within the topic.</i></p>		

## Summary of Processes and Controls NAF

<p>k. If the decision was made to accept the item, did the contracting officer seek an equitable adjustment and negotiate any other adjustment necessary? (AR 215-4, 5-66)</p> <p>l. Is the determination to accept or reject non-conforming items based on reason and extent of non-conformance, advice and recommendation from the receiving activity, the nature and extent of the contractual adjustment? (AR 215-4, 5-66a)</p> <p>m. Are contract disputes and appeals handled IAW AR 215-4, Section II, 7-11 through 7-20?</p> <p>n. Are NAF protests handled by an APF contracting officer accomplished in accordance with FAR, Subpart 33.1 and its supplements? (AR 215-4, 4-40a(2))</p> <p>o. Are contractor's requests for correction of a mistake in bid after award accomplished IAW AR 215-4, 4-46.2?</p> <p>p. Are performance evaluations for NAF entertainment contracts accomplished IAW AR 215-1, 8-12?</p> <p>q. Are ratification of NAF unauthorized commitments accomplished IAW AR 215-4, 1-24?</p> <p>r. NAFIs shall remain impartial and refrain from conciliation, mediation, or arbitration in labor disputes between the contractor and its employees. (AR 215-4, 2-7)</p> <p>s. Were termination for convenience attempted on a no-cost-to-either-party basis? (AR 215-4, 7-24)</p> <p>t. Were terminations for default accomplished IAW AR 215-4, 7-25?</p>			
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APPENDIX A  
Sample Notification Letter

AFLG-PR (715)

<date>

MEMORANDUM FOR Commander, <installation>, <address>

SUBJECT: Contracting Management Review (CMR)

1. The FORSCOM PARC will conduct a CMR of the <installaton> Directorate of Contracting (DOC) during the period <dates>. Reviewers will use Pamphlet 715-9, "A Guide for Success," <date> for the review and your DOC self-assessment.
2. The Director of Contracting (DOC) should provide an entrance brief to the CMR Team using "Topics for DOC In-Brief To Forscom CMR Team" (Items I-VII) at enclosure 1. The team will conduct an exit brief for your staff on the final day of the CMR. Attendance at briefings is open to any/all members of the DOC staff that you wish to include. We request that an entrance briefing be scheduled with the Garrison Commander or designee for the CMR Team Leader following the entrance brief to your staff.
3. The CMR Team is composed of <names of CMR Team Members> and <CMR Team Leader Name>, who will be the CMR Team Leader. <NAF CMR Team Leader Name> will conduct a CMR of NAF Contracting actions performed in the DOC and will need access to the applicable data listed in enclosure 1.
4. We recommend you take advantage of our visit to seek help on any contracting-related problems or issues you may have. Please identify areas for assistance to the CMR Team Leader as soon as possible but NLT <date>.
5. Please provide sufficient work space for <number> people and access to a current set of electronic or hard copy acquisition regulations, and coordinate with the CMR Team Leader to schedule an exit brief with the Garrison Commander or designee following the exit brief to your staff. We request you schedule courtesy visits for the Team Leader with your major customers and provide us with the name and phone number of a major on and off-post customer prior to the CMR.
6. We will be forwarding customer surveys to both government and contractor DOC customers to provide feedback about the DOC's customer service program. Survey results will be shared with you during the CMR.
7. In accordance with memorandum, AFLG-PR, dated 3 Nov 98, subject: Contract Management Review Process at enclosure 3, the DOC is required to perform a self-assessment prior to our visit. Please provide a copy of the self-assessment to the CMR

APPENDIX A  
Sample Notification Letter

AFLG-PR  
SUBJECT: Contracting Management Review (CMR)

Team Leader NLT COB <date>.

Your self-assessment should also address both primary and additional “Areas of Special Interest for Fiscal Year (FY) 01” at enclosure 2, identified in the attachment to 1 Sep 2000 memorandum signed by Mr. Elgart.

8. If you have any questions, <CMR Team Leader name>,< CMR Team Leader e-mail address> can provide additional information on the CMR.

Encls  
as

CHARLES J. GUTA  
COL, AC  
Chief, Contracting Division, DCSLOG  
Principal Assistant Responsible  
for Contracting

## APPENDIX B-1

### Instructions for Completion of Rating Form

1. Prior to the out-briefs, each team member will provide the Team Chief two to five strengths/weaknesses (ups and down) along with their overall assessment of the functional area reviewed. Any special laudatory comments should also be noted.
2. The Team Chief is responsible for completing the Rating Form and including bullet type assessments of strengths and weaknesses. The bullet assessments should be brief and entered on the form for each area rated.
3. The form should be typed, if possible. Handwritten is acceptable if neat and legible.
4. The Team Chief should sign and date the form.



FORSCOM CONTRACTING MANAGEMENT REVIEW

Fort xxxxxxxx, -DD/MM/YY

OVERALL SELF-ASSESSMENT RATING:

VALIDATED: YES / NO

\*\*\*\*\*

I. MANAGEMENT AND ADMINISTRATION:

UPS

DOWNS

II. SIMPLIFIED ACQUISITIONS:

UPS

DOWNS

III. FORMAL CONTRACTS:

UPS

DOWNS

IV. CONTRACT ADMINISTRATION:

UPS

DOWNS

V. NON-APPROPRIATED FUND PROCUREMENTS: (Accomplished by the DPCA)

UPS

DOWNS

TEAM CHIEF  
(Name)

**CONTRACTING MANAGEMENT REVIEW (CMR)**

**IN-BRIEF**

**FOR**

**GARRISON COMMANDER**

This is a courtesy call and occurs only if the Garrison Commander wishes.

Attendees: Garrison Commander, Director of Contracting and the Team Chief

Discuss the following:

1. The purpose and objectives of the CMR.
2. The composition of the CMR Team.
3. That the CMR will be conducted IAW FORSCOM Pamphlet 715-9, Forces Command Contracting Management Review Guide.
4. Discuss the self-assessment/validation process and rating scheme (Outstanding, Above Average, Satisfactory, Marginal, Unsatisfactory). This CMR will not be a duplication of the self-assessment, but rather a validation (concurrence/ non-concurrence) of self-assessment and further inquiry of areas addressed in the self-assessment
5. Advise the Commander that three separate ratings will be validated: Overall DOC rating, NAF Procurement accomplished by DPCA, and Legal Support (optional).
6. The basic intent is to assess the business processes and management controls within the DOC. However, CMR team will provide assistance on an as needed basis and if requested.
7. We will be looking for innovation and good business practices as well as systemic problems.
8. Emphasis is on assistance to the DOC; not a witch hunt for findings.
9. We will visit key customers such as the DOL and DPW.
10. We will out-brief the Garrison Commander on the last day of the CMR and provide a one page-rating summary. Leave him a blank of the one page summary at this time (**Appendix B-2**).

**CONTRACTING MANAGEMENT REVIEW**  
**IN-BRIEF FOR**  
**DIRECTORATE OF CONTRACTING (DOC)**

This in-brief is held upon arrival of the CMR Team at the DOC

Attendees: Full CMR Team and the Director of Contracting and his/her supervisory staff

1. DOC presents briefing to CMR Team.
2. Team Chief introduces team members and states the area each will work in.
3. Conduct of CMR:
  - a. Advise that CMR has no hidden agenda and will be conducted as outlined in CMR Guide. Reiterate the items discussed with the Garrison Commander.
  - b. State purpose and objectives of the CMR.
4. Advise that team members will update appropriate supervisor each day and Team Chief will update the Director.
5. Verify who to see for files and if team members talk to workers with or without the supervisor present.
6. Identify customers to be visited and ask the Director to arrange the time for each visit.
7. Administrative Matters. If not covered in DOC briefing to the team, clarify the following:
  - Office Hours
  - Location of Rest Rooms
  - Availability of Coffee and Cost
  - Statement of non-availability of government housing
  - Any information requested in our notification letter
8. Provide the DOC the PARC's opinion of the self-assessment, including the merits of the overall score. Emphasize that the CMR will not be a duplication of the self-assessment, but rather a validation and further inquiry of areas addressed in the self-assessment.

**CONTRACTING MANAGEMENT REVIEW (CMR)**

**OUT-BRIEF FOR**

**DIRECTORATE OF CONTRACTING (DOC)**

This out-brief is usually held on the morning of the last day of the CMR and, if possible, prior to the out-brief for the Garrison Commander.

Attendees: Full CMR Team, the Director of Contracting and his/her Supervisory Staff, other staff at option of the Director.

1. Advise attendees of overall concurrence/non-concurrence with DOC self-assessment. It should be stressed in the out-brief that the rating is tentative and subject to change either up or down.
2. Provide Director the one page assessment to be provided to the Garrison Commander.
3. Each team member will identify any special laudatory comments and major areas deserving recognition and discuss the major strengths/weaknesses of the functional area evaluated.
4. Depending on the overall validation, each sub-element need not be addressed unless specifically requested by the Director. For example, if the overall rating is satisfactory, only those sub-elements receiving greater or less than satisfactory should be addressed.
5. Any finding/observation that will be addressed in the final CMR report should be discussed briefly. No major discussion is necessary because the team member should have previously advised and discussed the finding with the Division Chief/Supervisor of the functional area being reviewed.
6. If during the conduct of the CMR any issues arise which require policy/training by the PARC office, these issues will be identified to the attendees.
7. Advise attendees that the CMR report will be completed within 30 calendar days and forwarded to their Garrison Commander with a response required 60 calendar days after receipt, unless otherwise specified in the report.
8. The team may identify those areas of the self-assessment that require additional work.

**CONTRACTING MANAGEMENT REVIEW (CMR)**

**OUT-BRIEF FOR**

**GARRISON COMMANDER**

The out-brief will be held at the convenience of the Garrison Commander, preferably on the last day of the CMR following the out brief to the Directorate of Contracting.

Attendees: Garrison Commander, Director of Contracting, and the Team Chief. The PARC will attend if on-site.

1. Advise the Garrison Commander of the overall validation of the DOC self-assessment. Advise him also of the rating for NAF Procurement accomplished by DPCA and Legal Support. It should be stressed in the out brief that all ratings are tentative and subject to change either up or down.
2. Make any special laudatory comments and any specific areas deserving recognition.
3. Describe the major strengths/weaknesses (ups and downs).
4. Provide the one page written assessment and results of the CMR (**Appendix B-2**).
5. Advise the Garrison Commander that the CMR report will be completed within 30 calendar days and forwarded to the installation with response required 60 calendar days after receipt unless otherwise specified in the report.

APPENDIX E  
CMR Milestones

**CMR Milestones**

<b>30 July FYxx</b>	Submit Schedule to PARC for FYx+1	<b>CMR + 22 Days</b>	Draft Report Due to Mgmt TL
<b>15 August FYxx</b>	Publish CMR Schedule	<b>CMR + 24 Days</b>	Mgmt TL Returns Report for Corrections or Final
<b>CMR - 90 Days</b>	Send Notification to DOC	<b>CMR + 27 Days</b>	TC/AO Makes Final Corrections and Submits Report Thru Mgmt TL to PARC
<b>CMR -30 Days</b>	DOC submits self-assessment To PARC		
<b>CMR - 14 Days</b>	Finalize Team Composition	<b>CMR + 30 Days</b>	Report Approved and Released
<b>CMR - 7 Days</b>	Team Chief (TC)Meets with PARC and Team Members	<b>CMR +40 Days</b>	Lessons Learned due to Mgmt Team Leader
<b>CMR +4</b>	SIGACT due		
<b>CMR + 7</b>	KCI Due	<b>DOC Receipt + 60 Days</b>	DOC Response Due to PARC (Mgmt Team tracks)
<b>CMR + 12 Days</b>	Team Member (TM) Input Due to Team Leader (TL)	<b>PARC Receipt + 10 Days</b>	Team Member Reclama to TC
<b>CMR + 14 Days</b>	TL Submits to CMR TC	<b>PARC Receipt + 20 Days</b>	TC Submits Reclama Thru Mgmt TL to PARC for Release
<b>CMR + 16 Days</b>	Input to Action Officer (AO) for Preparation of Report		
<b>CMR + 19 Days</b>	Draft Report to TC	<b>CMR + 180 Days</b>	Follow-up CMR, if Required

## **Centurion Program**

The “Centurion” program was inaugurated in 1995 by the FORSCOM Inspector General as the primary Command tool for assessing the effectiveness by each FORSCOM installation in performing its mission and meeting the needs of its customers. The total installation is evaluated by self-assessment; separate functional activities are evaluated only to the extent that they contribute to performance of the overall mission. Centurion uses seven major criteria categories adapted from the Malcolm Baldrige National Quality Award. The seven categories integrate each organization’s overall customer and operational performance requirements, and are applicable to virtually any size, type of mission or scope of activities. The following matrix is provided as a guide for identifying those acquisition processes, actions, and measurement approaches which is used by leadership and plays an integral part in the installation’s mission, and where they may be addressed under the seven (7) Centurion performance criteria categories and subcategories.

### **Category 1.0 - Leadership.**

- a. Criteria. Organization’s senior leaders’ support and participation in quality efforts.
- b. Subcategories:
  - (1) Leadership System
  - (2) Company Responsibility and Citizenship
- c. The DOC Input. Installation Acquisition Planning Board chaired by senior leadership; leadership involvement in DOC sponsored activities with business and community activities; DOCs role in supporting leadership’s goal and objectives.

### **Category 2.0 - Strategic Planning.**

- a. Criteria: Planning process for long and short term goals, objectives, and requirements.
- b. Subcategories:
  - (1) Strategy Development Process
  - (2) Company Strategy
- c. DOC Input: Processes and products that support the command’s mission, including Contingency Plans; Mobilization Plans; Contractor Strike Plans; Advanced Acquisition Plans; Acquisition Reform Strategic Plans; and Major Contract Transition Plans (BASOPS and Total Contracted Functions).

### **Category 3 - Customer and Market Focus.**

- a. Criteria: All facets of external customer contacts: surveys, requirements development, feedback, and products and services.
- b. Sub-categories:
  - (1) Customer and Market Knowledge.
  - (2) Customer Satisfaction and Relationship Enhancement.
- c. The DOC’s Input: Contract partnerships and councils; collocation of employees in customer organization; customer education and support programs; acquisition teams (contracting, legal, and functional); customer surveys (including feedback and response); DOC Contracting Workshops; Process Improvement Procedures (internal and external); terminals for contractors in bid rooms; SAACONS terminals in customer activities.

### **Category 4.0 - Information and Analysis:**

- a. Criteria: Management and use of data and information.
- b. Subcategories:
  - (1) Selection and Use of Information and Data.

## APPENDIX F

### Centurion and the DOC

(2) Selection and Use of Comparative Information and Data.

(3) Analysis and Review of Company Performance.

c. The DOC Input: SAACONS - what data is collected, what the data is used for, who the data is shared with; quality checks to determine value of collected data, both internal and external; use, coordination, measurement and benefits of all data to determine the outcome of the desired product or service.

Category 5.0 - Human Resource Development & Management.

a. Criteria: Management and development of people.

b. Sub-categories:

(1) Work Systems.

(2) Employee Education, Training and Development.

(3) Employee well-being and Satisfaction

c. The DOC Input: DAWIA – Training/Certification Program; Awards Program; internal quality checks for improvement of employee performance/well being; cross-training and professional development of employees.

Category 6.0 - Process Management.

a. Criteria: Organization's overall process management.

b. Sub-categories:

(1) Management of Product and Service Processes

(2) Management of Support Processes

(3) Management of Supplier and Partnering Processes

c. The DOCs Input: Internal review process ("CMR Guide"); Contract Management Review process; Reengineering Initiatives/Issues; contract management and services; oversight processes/ procedures; Pre-award Plans (Formal Source Selections, Pre-negotiation Objective Memorandum, and Price Negotiation Memorandum); Post Award Plans (Award Fee Plans, Property Administration Plans, Contract Administration Plans, Quality Assurance Surveillance Plans); collocation of employees in customer organizations; benchmark of processes performed in other DOCs; management of contractor Past Performance Information System; description of qualifications process for major contract suppliers; integrity and fairness of competitive process.

Category 7 - Business Results.

a. Criteria: Reporting, comparing and bench marking of organization's key products or services.

b. Sub-categories:

(1) Customer Satisfaction Results.

(2) Financial and Market Results.

(3) Human Resource Results.

(4) Supplier and Partner Results.

(5) Company-Specific Results.

c. The DOC's Input: Number of success-fully competed contracts; tracking of CALT/PALT; savings tracked and reported on contract actions; costs procedures and results of how tracked; trend analysis of awards, protests, Congressionals; procurement reporting; contractor performance evaluations; contractor past performance reports; any procurement status reporting.



## APPENDIX G

### Legal Support

**GENERAL.** This section describes the areas the FORSCOM legal representative will review:

- a. General Acquisition Support
- b. Legal Reviews
- c. Written Communications
- d. Procurement Fraud
- e. Legal Research Assets
- f. Training
- g. DOC Staff Interviews

**GENERAL ACQUISITION SUPPORT:** In conducting the CMR, the FORSCOM team, dependent on available resources, may include a FORSCOM attorney, who will assess acquisition legal support (ALS). Specifically the working relationship between the contracting office staff and the principal assigned attorney(s) will be assessed, as well as the frequency and quality of ALS as evidenced by the participation of legal counsel in the procurement process.

- a. The following topics should be covered with the SJA:
  - (1) Is the SJA involved in acquisition issues?
  - (2) Is the SJA comfortable that adequate legal support is available?
  - (3) Is the SJA prepared to discuss contract types with the commander?
  - (4) Does the SJA generally take an interest in procurement matters?
  - (5) Has the SJA visited the contracting office?
  - (6) Is there backup and continuity in contract legal support?
  - (7) How closely does the SJA monitor acquisition law advice?
  - (8) Has the Office of the SJA (OSJA) provided instruction for members of the command on irregular acquisitions and fiscal law matters?
  - (9) Has the SJA briefed procurement officials on Procurement Integrity?
  - (10) What is the general attitude of the command group and staff concerning acquisition law issues? What actions has the SJA taken to foster sensitivity to acquisition law issues?
- b. The following topics should be covered with the Principal Attorney:
  - (1) Is there backup and continuity in contract legal support?
  - (2) As applicable, what acquisition law advice is planned for pre-deployment and deployment?
  - (3) How many bid protests were filed during the past quarter and fiscal year? How many sustained? What issues were involved and what remedial measures were undertaken? To what extent was the OSJA consulted and involved?
  - (4) How many contract claims were filed during the past quarter and past fiscal year? What issues were involved and what, if any, remedial measures were undertaken? To what extent was the OSJA consulted and involved?
  - (5) How many Contracting Officer's Final Decisions were issued during the past quarter and fiscal year? What issues were involved? How many were appealed to the ASBCA or Court of Federal Claims? To what extent was the OSJA involved or consulted?
  - (6) What is the general attitude of the command group and staff concerning acquisition law issues? What actions has the SJA taken to foster sensitivity to acquisition law issues?
- c. The following topics should be covered with the Contracting Office:
  - (1) Is there an active Commercial Activities (CA) Program at the installation? What is the status of the program? How is it organized? Does the contract lawyer participate fully?

## APPENDIX G

### Legal Support

- (2) Does the OSJA generally take an interest in procurement matters?
- (3) Does the contracting officer know who is his/her principal contract lawyer? (In this regard, does the contracting officer view “his” lawyer as part of the contracting team or merely another obstacle to overcome?)
- (4) Is the installation anticipating any significant procurement of Information Technology (IT) within the coming year?
- (5) Has the SJA office briefed procurement officials on Procurement Integrity?
- (6) How many contracts, and what percentage of annual contract dollars, were awarded during the last quarter of the fiscal year? Could any have been awarded earlier with advance planning?
- (7) How many bid protests were filed during the past quarter and fiscal year? How many sustained? What issues were involved and what remedial measures were undertaken? To what extent was the OSJA consulted and involved?
- (8) How many contract claims were filed during the past quarter and past fiscal year? What issues were involved and what, if any, remedial measures were undertaken? To what extent was the OSJA consulted and involved?
- (9) How many Contracting Officer's Final Decisions were issued during the past quarter and fiscal year? What issues were involved? How many were appealed to the ASBCA or Court of Federal Claims? To what extent was the OSJA involved or consulted?
- (10) What is the general attitude of the command group and staff concerning acquisition law issues? What actions has the SJA taken to foster sensitivity to acquisition law issues?
- ? (11) Has the acquisition portion of the mobilization plan been reviewed and revised?
- (12) How many contracts were awarded during the past quarter and past fiscal year other than by full and open competition? What percentage of total contracts awarded and totals dollars were involved in these awards?

**LEGAL REVIEWS.** It is Army policy that lawyers will be fully involved in the procurement process. In some instances legal review is mandatory; at other times, the OSJA should be consulted to the extent that legal counsel is available. Lawyers should encourage contracting officers to seek their advice even if there is no regulatory requirement that they do so for the issue concerned. (AFARS 1.602-2(c) Legal Participation).

- a. Is the OSJA involved in procurement planning? (AFARS 1.602-2(c)(i)).
- b. Does the OSJA review solicitations (services, supplies, construction, and IT) expected to exceed \$100,000?
- c. Does the OSJA review significant decisions during the acquisition process involving legal issues, e.g., determinations of non-responsiveness or non-responsibility, determinations regarding alleged mistakes in bids, and any other issues potentially affecting the propriety of the proposed award?
- d. Does the OSJA review solicitations in amounts under \$100,000?
- e. Are clauses reviewed for compliance with DFARS 201.304?
- f. Are acquisitions for leasing, operation and maintenance or repair of motor vehicles and aircraft reviewed?
- g. Are acquisition plans reviewed? (AFARS 1.602-2(c)(iv)(A))
- h. Are J&As reviewed? (AFARS 1.602-2(c)(iv)(B)).
- i. Does the contract lawyer advise the contracting officer how to correct legally insufficient contract actions? (AFARS 1.602-2(c)(iii)).
- j. Does the SJA review Non-appropriated fund contracts? (AR 215-4, 1-4c and 1-13(a)).

## APPENDIX G

### Legal Support

- (1) Solicitations/contracts expected to exceed \$100,000.
  - (2) Awards that may result from unsolicited proposals.
  - (3) Decisions on disputes, protests, appeals and terminations.
  - (4) Suspension and debarments.
  - (5) Blanket Purchase Agreements.
  - (6) FOIA requests.
  - (7) Concessionaire, professional service, and amusement company contracts.
  - (8) Ratification's.
  - (9) All requests for use of other than firm-fixed price contracts.
  - (10) Determinations of whether a proposed service is for personal or nonpersonal services, when not clearly defined
- k. Does the OSJA participate on contract writing teams?
  - l. Does the OSJA review all actions that require HCA approval?
  - m. Does the OSJA participate in POM/PNM preparation and review completed POMs/PNMs?
  - n. Does the OSJA participate fully in all steps of a negotiated contract?
  - o. What is the extent of legal participation in the administration of contracts?
  - p. Are there local government contract training programs? Does the OSJA participate?

#### **WRITTEN COMMUNICATIONS:**

- a. Are files indexed and well organized?
- b. Are opinions clear and concise? Does the attorney provide helpful advice in addition to commenting on legal sufficiency?
- c. Are briefs for Trial Attorneys Litigation Files and Bid Protest Files thorough (facts, issues, law) and well written? (This brief will usually be the first thing the Contract Appeals Division (USALSA) or Contract Law Division (OTJAG) Attorney reads).
- d. Is legal advice correct?
- e. Is legal advice provided in a timely manner?
- f. How many actions, requiring written responses, are generally filed per quarter?

**PROCUREMENT FRAUD PROGRAM.** The SJA should be aware of the following areas of concern:

- a. Does the installation have a designated Procurement Fraud Advisor?
- b. Has this person received training?
- c. Has the SJA conducted training for the DOC?
- d. Are procurement personnel sensitive to procurement fraud indicators?
- e. Are there any on-going investigations and are any suspensions or debarments proposed?
- f. Is there a procurement fraud SOP?

**LEGAL RESEARCH ASSETS.** In addition to the procurement regulations (FAR/DFARS/AFARS), SJA offices should have sufficient secondary legal research sources. While the SJA offices may not need all of the following resources, all of them are useful.

- a. United States Code.
- b. Federal Register.
- c. Comptroller General Procurement Decisions (CPD).
- d. Federal Procurement Decisions (FPD).
- e. Boards of Contract Appeals Decisions (BCA).
- f. Government Contracts Reporter (CCH).

## APPENDIX G

### Legal Support

- g. Formation of Government Contracts, Administration of Government Contracts, Competitive Negotiation, all by Nash and Cibinic.
- h. The Army Lawyer.
- i. The Military Law Review.
- j. The FFARS.
- k. The DFAS-IN 37-1, Army Accounting and Fund Control.
- l. Army regulation 215-4, Non-appropriated Fund Contracting (MWR Update Pam).
- m. Most recent DOD Authorization Act, Appropriations Act, and Military Construction Act (U.S. Code Cong'l and Admin. News).
- n. The DOD IG Publications, Indicators of Fraud in DOD Procurement and Handbook on Labor Fraud Indicators.
- o. LEXIS access or other computer legal research accesses.
- p. Are Acquisition Letters and Contract Information Letters filed (or available on the Internet)?

**TRAINING.** All lawyers must keep abreast of the latest developments in the law. Whether it is to meet State CLE requirements or to keep current, lawyers should regularly attend courses. The JAG School provides procurement courses throughout the year. The ABA, State and Federal Bars, Federal Publications, Inc., and other organizations also provide useful courses. The courses listed below are representative. All contract lawyers should have completed at least the 2-week contract course offered by the JAG School. We strongly encourage attending the following courses (particularly Fiscal Law):

- a. Contract Lawyers Course.
- b. Contract Claims, Litigation, and Remedies.
- c. Procurement Fraud.
- d. Government Contract Law Symposium.
- e. Advanced Acquisition Course.
- f. Fiscal Law.

**CONTRACTING STAFF INTERVIEWS.** The FORSCOM lawyer will be working with other members of the FORSCOM CMR Team during the visit. The FORSCOM legal representative will ask various members of the DOC staff (and possibly DOC customers, such as DOL) about the quality of legal support. The FORSCOM lawyer will out brief the SJA.

APPENDIX H  
Areas of Special Interest